

**BIOGAS RENEWABLE GENERATION PROJECT  
FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**

RESPONSE TO COMMENTS  
March 9, 2018

## **8.0 RESPONSE TO COMMENTS**

### **8.1 SUMMARY OF WRITTEN COMMENTS RECEIVED DURING THE PUBLIC REVIEW PROCESS FOR THE DRAFT EIR**

Written comment on the Draft MND received during the public review period are included in this section. The comment letters are provided at the end of the section, following all of the responses. When a comment is made by multiple parties, the response is provided the first time the comment is made, and all other similar comments are referred back to that response.

The format of the responses to all the comments is based on a unique letter and number code for each comment. The letter and number immediately following the letter refer to an individual agency, business, group, organization, or member of the general public comment letter. The number at the end of the code refers to a specific comment within the individual letter. Therefore, each comment has a unique code assignment. For example, comment L-1 is the first comment in letter L1.

Comments were received on the proposed Draft MND and they were reviewed to determine whether there is substantial disagreement about the potential significance of impacts. Any issues raised concerning potentially significant impacts were reviewed, addressed, and clarified.

Written comments received from State Agencies: 1

Written comments received from Regional and Local Agencies: 8

Written comments received from Interest Groups: 15

Written comments received from the General Public: 105

**Table 8-1 Comment Letters**

<b>Name</b>	<b>Date</b>	<b>Letter Number</b>
Jack Cheng	09/15/17 & 09/22/17	1
Amy Minter	09/26/17	2
Cynthia Kellman	09/26/17	3
Jose Huizar	09/27/17	4
Richard Schmittiel	09/27/17	5
Dianna Watson	09/28/17	6
Lisa Karahalios	09/28/17	7
Flor Mendez	09/29/17	8
Kim Turner	09/29/17	9

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<b>Name</b>	<b>Date</b>	<b>Letter Number</b>
Sean Starkey	09/29/17	10
Harvey Slater	10/05/17	11
Greg Merideth	10/09/17	12
Shari Afshari	10/10/17	13
Frances F. Coburn	10/15/17	14
Joan Morris	10/15/17	15
MeHee Hyun	10/16/17	16
Susan Phillips	10/16/17	17
Communities United	10/17/17	18
David Choi	10/17/17	19
Marie Freeman	10/17/17	20
Marla Nelson	10/17/17	21
Nancy E. Robbins	10/17/17	22
Lijin Sun	10/17/17	23
Brian Bard	10/18/17 & 10/20/17	24
Celine Abrahams	10/18/17	25
Rick Marquis	10/18/17	26
Marla Nelson	10/18/17	27
Martins Aiyetiwa	10/18/17	28
Owen and Robin Lewis	10/18/17	29
Sue Flocco	10/18/17	30
Clarence A. Hall	10/19/17	31
Dennis Malone	10/19/17	32
Elizabeth Ferrari	10/19/17	33
Gary Sysock	10/19/17	34
Gerry Rankin	10/19/17	35
Helen Mallory	10/19/17	36
Linda Pillsbury	10/19/17 & 10/20/17	37
Liz Amsden	10/19/17	38
Marie Freeman	10/19/17	39
Michael Mallory	10/19/17	40
Miri and Andrew Hinds	10/19/17	41
Monica Cheang	10/19/17	42
Peter Finestone	10/19/17	43
Russell Kataoka	10/19/17	44
Sharon Landin	10/19/17	45
Suzanne Smith	10/19/17	46
William Malone	10/19/17	47



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<b>Name</b>	<b>Date</b>	<b>Letter Number</b>
Audrey Mandelbaum	10/20/17	48
Burt Culver	10/20/17	49
Dianna Jaynes	10/20/17	50
Erik Blank	10/20/17	51
Jennifer Hoffman	10/20/17	52
Joel Aldape	10/20/17	53
Joel Arquillos	10/20/17	54
John Crooke	10/20/17	55
John Dunlop	10/20/17	56
Justin King	10/20/17	57
Kenny Sylvain	10/20/17	58
Kevin Tseng	10/20/17	59
Lisa Karahalios	10/20/17	60
Marites Ruano	10/20/17	61
Marti Doughty	10/20/17	62
Mary Lynch	10/20/17	63
Michael Frey	10/20/17	64
Mindy O'Brien	10/20/17	65
Nik Hoffman	10/20/17	66
Pia Harris	10/20/17	67
Priscila Kasha	10/20/17	68
Rachel Arruejo	10/20/17	69
Ryan Reilly	10/20/17	70
Timothy Campbell	10/20/17	71
Tony Bautista	10/20/17	72
Trish & Frank DeFoe	10/20/17	73
Trish & Frank DeFoe	10/20/17	74
Veronica Diaz	10/20/17	75
Walt Kasha	10/20/17	76
Brian Medina	10/21/17	77
Dan Kruse	10/21/17	78
Daniel Brotman	10/21/17	79
Hury Babayan	10/21/17	80
Jane Demian	10/21/17	81
Patricia Hill	10/21/17	82
Angela Vukos	10/22/17	83
Art and Socorro Vilches	10/22/17	84
Lynn Woods	10/22/17	85

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<b>Name</b>	<b>Date</b>	<b>Letter Number</b>
Madeleine Avirov	10/22/17	86
Maureen Perkins	10/22/17	87
Mitchell Rubinstein	10/22/17	88
Renee Holt	10/22/17	89
Bethsaida A. Castillo-Cifuentes	10/23/17	90
Jennifer Hoffman	10/23/17	91
Mark Whitney	10/23/17	92
Matthew Paine	10/23/17	93
Randall Wise	10/23/17	94
Brooke Owen	10/29/17	95
Burt Culver	10/31/17	96
Amy Koss	11/02/17	97
Herant Khanjian	11/02/17	98
James Flournoy	11/02/17	99
James Flournoy	11/02/17	99
Marguerita Drew	11/02/17	100
Melodie Khanjian	11/02/17	101
Burt Culver	11/03/17	102
Michelle Gunn	11/03/17	103
Burt Culver	11/05/17	104
James Flournoy	11/06/17	105
Randall Wise	11/06/17	106
Amy Minter	11/07/17	107
James Flournoy	11/08/17	108
Jose Huizar	11/08/17	109
Mike Smithson	11/08/17	110
Arin Rao	11/09/17	111
Ashfaq Chowdhury	11/09/17	112
Audry Zarokian	11/09/17	113
Barrett Cooke	11/09/17	114
Carrie Hansen	11/09/17	115
County of LADPW	11/09/17	116
Emily Simon	11/09/17	117
ERNC	11/09/17	118
Frankie Norstad	11/09/17	119
Greg Merideth	11/09/17	120
Hans Johnson	11/09/17	121
Hans Johnson	11/09/17	122

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<b>Name</b>	<b>Date</b>	<b>Letter Number</b>
Jane Potelle	11/09/17	123
John Nugent	11/09/17	124
Linda Johnstone Allen	11/09/17	125
Meldia Yesayan	11/09/17	126
Seth Cutler	11/09/17	127
Teri Stein	11/09/17	128
Bethsaida Emilia Castillo	11/09/17	129

### 8.1.1 Topical Responses

A number of comments received on the Draft MND tended to focus on several main issues and topics associated with the Project and CEQA-related process and analysis. Although a lead agency is only required to “consider” but is not required to prepare responses to such comments (Pub Res C section 21091 (d); 14 Cal Code Regs section 15074(b), the lead agency has nonetheless prepared responses to amplify and clarify information contained in the Draft MND. Individual responses and Topical Responses were prepared to as an efficient means to respond to comments. The main issues warranting Topical Responses and include the following:

**Table 8-2 Topical Responses**

<b>Topics</b>	<b>Topical Response No.</b>
Biogas Renewable Generation Project Relationship to Landfill Expansion	1
Biogas Renewable Generation Project Relationship to Grayson Repowering Project	2
CEQA – MND vs. EIR	3
Cumulative	4
Aesthetics	5
Air Quality / Greenhouse Gases	6
Geology and Soils	7
Hazards and Hazardous Materials	8
Noise and Traffic and Transportation	9
Public Noticing and Project Location	10

#### 8.1.1.1 Topical Response 1: Project Description Biogas Relationship to Landfill Expansion

##### Summary of Comments

Comments were received stating opposition to the proposed Scholl Canyon Landfill Expansion, as well as concerns that the Project would result in extending the operational life of the landfill. Comments were received expressing concern about trucks carrying refuse to the Scholl Canyon Landfill dumping their loads along the landfill access road rather than at the landfill itself to avoid payment of waste tipping fees causing an inconvenience to nearby residents.

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Commenters additionally expressed concern that an increase in trucks carrying refuse to the Scholl Canyon Landfill would result in an increase in traffic on area roadways and an increase in public safety risk.

### **Response**

In March 2014, a Draft Environmental Impact Report (DEIR) for the Scholl Canyon Landfill Expansion was circulated for public review. The City has no immediate plans to proceed with any expansion of the landfill, and possibly may not proceed with such an expansion for some time, if ever.

The Project would be located on a site within the Scholl Canyon Landfill where landfill gas is already collected and processed. The amount of waste that can be disposed of at Scholl Canyon Landfill is limited by the volumes approved by existing County of Los Angeles Public Health permit limits. These limits are fixed and cannot be increased without a permit modification and specific project CEQA review; which is not a part of this Project or this MND. Regardless of landfill operation, expansion, or even closure, landfill gas would continue to be generated for many years, well after landfill closure as waste materials continue to decompose.

The Project was designed, and equipment selected to utilize the existing volume of landfill gas currently generated and does not have the capacity to accept any additional volume of landfill gas. In addition, the life expectancy of the electrical generation equipment proposed is approximately 20 years. Based on the existing landfill gas production and the amount of refuse being placed within the landfill during the existing permitted life of the landfill, the quantity of landfill gas produced without any landfill expansion is sufficient to supply the Project for its 20-year life span. SCAQMD and federal regulations mandate that landfill gas be combusted. Combusting the landfill gas in the proposed engines provides environmental benefits over the use of the existing flares because the proposed internal combustion engines emit lower emissions than flares. The Project will also generate renewable portfolio standard eligible electrical power which provides economic benefits over the 20-year Project life span regardless of whether a landfill expansion is approved.

The Project has no relation to, or effect on, existing truck traffic stemming from landfill operations. The Project will generate nominal traffic of six trips per day during Project operations. During construction there will be up to 23 trips per day, including construction workers. The Project will be implemented over four to five months for demolition, nine to ten months for site grading and construction, and two to three months for system start up. Please refer to the MND Section 2.5 for the Project schedule.

### ***The Biogas Renewable Generation Project is a Separate Proposal and has Independent Utility***

The Project has independent utility and is not dependent on and does not compel the expansion of, or continued operation of, the existing landfill. The Scholl Canyon Landfill

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Expansion Project is not a part of the Biogas Renewable Generation Project. Continued operation of the landfill and any potential expansion of the landfill in no way compel development of the Biogas Renewable Generation Project. In the same way, the Biogas Renewable Generation Project does not compel or presume completion of the Scholl Canyon Landfill Expansion Project. Neither the Scholl Canyon Landfill Expansion Project nor the Biogas Renewable Generation Project is a reasonably foreseeable consequence of the other. Glendale already has a SCAQMD permitted biogas capture and flaring system at Scholl Canyon that is capable of combusting any and all biogas generated by the landfill.

Under Glendale's existing SCAQMD permit, the landfill gas at Scholl Canyon must be combusted, and that combustion requirement (SCAQMD or otherwise) does not mandate the landfill gas be used to generate electricity, although there are environmental and economic benefits to using the landfill gas for such generation rather than flaring it.

The Biogas Renewable Generation Project and the Scholl Canyon Landfill Expansion Project serve different purposes. The purpose of the Biogas Renewable Generation Project is to:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio;
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades;
- Build an on-site power plant utilizing LFG as fuel; and
- Abandon the existing pipeline between the landfill and Grayson Power Plant, which would in turn allow the South Coast Air Quality Management District (SCAQMD) to make priority reserve offsets available and offsets would not have to be purchased on the open market. (Please refer to MND Section 1.1)

The purpose of the Scholl Canyon Landfill Expansion Project is to continue to:

- Provide a waste disposal option that has been proven to be environmentally sound and cost-effective at the currently permitted rate.
- Continue waste diversion programs that are critically important for land fill users to achieve state-mandated diversion requirements.
- Allow the City to maximize the use of a local resource for waste disposal, thus minimizing hauling distances and the related environmental impacts.
- Allow for further development of disposal and [waste] diversion options, such as alternative technologies for landfill users. (Draft EIR Scholl Canyon Landfill Expansion Project Section 4.2)

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The Biogas Renewable Generation Project and the Scholl Canyon Landfill Expansion Project have different purposes and objectives; they would be implemented independently from each other and do not depend on each other. Under CEQA, a proposal that is related to a project, but has its own “independent utility” and is not necessary for the project to proceed, need not be included as part of the project description, and may be reviewed in its own CEQA document, as a separate project. *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237. Accordingly, two projects may undergo separate environmental review when the projects serve different purposes or can be implemented independently. *Banning Ranch v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223 (citing *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 99; *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 699; *Plan for Arcadia v. City Council of Arcadia* (1974) 42 Cal.App.3d, 712, 724).

In addition, CEQA review must include an analysis of the environmental effects of future expansion or other action if: “(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” *Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 396. Absent these two circumstances, the future action need not be considered in the MND for the Project.

As clarified in this Topical Response No. 1, the Biogas Renewable Generation Project is not a reasonably foreseeable consequence of the Scholl Canyon Landfill and implementation of the Biogas Renewable Generation Project will not change the scope or nature of the Scholl Canyon Landfill Project, or change any environmental effects of the landfill.

### **8.1.1.2 Topical Response 2: Biogas Renewable Generation Project Relationship to Grayson Repowering Project**

#### **Summary of Comments**

Comments were received that the Project and the Grayson Repowering Project—must be analyzed as one project. Commenters claimed that both projects, if considered to be one project, would be subject to the jurisdiction of the California Energy Commission (“CEC”). Comments were received that neither the Grayson Repowering Project Draft EIR nor the Biogas Renewable Generation Project MND are properly accounting for greenhouse gas (“GHG”) emissions increases of landfill gas combustion, nor the potential for even greater emissions if the biogas project at the landfill is not built or if it fails to perform.

#### **Summary of Responses**

The proposed Biogas Renewable Generation Project is not a part of, or the same as, or a direct or reasonably foreseeable consequence of, the Grayson Repowering Project. The Scholl Canyon Landfill has an existing South Coast Air Quality Management District (SCAQMD) issued

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permit to burn the biogas emitted by the landfill regardless of whether it is burned at Grayson, flared on site, or captured and converted to energy on-site by other means. The Biogas Renewable Generation Project, for the reasons explained in this Topical Response, and in Topical Response No. 1 herein above, is an entirely separate project with independent utility. This means that regardless of whether the Grayson Repowering Project moves forward or not, the Biogas Renewable Generation Project is independently viable and can be developed.

The proposed Biogas Renewable Generation Project is designed to combust landfill gas and efficiently convert that gas into electrical energy which is fed into existing transmission lines at Scholl Canyon that connect with Glendale's existing electrical grid. Biogas from Scholl Canyon Landfill, which is a natural consequence of the decomposition of landfill materials, is required by the SCAQMD permit to either be flared or captured and converted to energy. Capturing and converting Scholl Canyon Landfill biogas is not a requirement of, or prerequisite to, the Grayson Repowering Project. The existing Grayson Plant and the proposed Grayson Repowering Project are not dependent on biogas from the Scholl Canyon Landfill. Similarly, the proposed Biogas Renewable Generation Project is not in any way dependent on the approval or implementation of the Grayson Repowering Project.

### **Response**

#### ***Current and Proposed Use of Landfill Gas***

Currently, the landfill gas collection system at Scholl Canyon Landfill conveys the collected gas to a central location within the landfill property where the gas is compressed, liquids are removed, and the raw landfill gas is piped approximately 5.5 miles to the Grayson Power Plant via an underground dedicated pipeline. At Grayson, the landfill gas is mixed with natural gas and is combusted in boilers to make steam for electricity generation. Currently, at Grayson, landfill gas can be combusted only in the boilers of Units 3, 4, and 5. Unit 3 is presently out of service and Units 4 and 5 have limited remaining useful life. However, these units are not needed to burn Scholl Canyon Landfill gas because the Grayson Repowering Project does not need landfill gas and because the landfill gas can be combusted at Scholl Canyon using the existing permitted flaring system.

#### ***The Biogas Renewable Generation Project***

The Biogas Renewable Generation Project at Scholl Canyon will convert landfill gas to electricity and feed that electricity into existing transmission lines located at Scholl Canyon. No new transmission lines are required to be constructed as part of the Biogas Renewable Generation Project. While landfill gas is permitted to be flared under existing air permits, it is a cleaner and more beneficial option to use landfill gas as fuel for renewable portfolio standard eligible power generation.

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According to the U.S. Department of Energy, U.S. Energy Information Administration, the five commonly used renewable energy sources include landfill gas and biogas, and municipal solid waste.<sup>6</sup> Landfills for municipal solid waste are a source of this energy from anaerobic bacteria—bacteria that can live without the presence of free oxygen—living in landfills that decompose organic waste to produce biogas. Landfills typically control the naturally occurring methane gas emissions by burning or flaring methane gas, or using it as an energy source. According to the U.S. Department of Energy, many landfills collect biogas, treat it, and then sell the methane, and some landfills use the methane gas to generate electricity.<sup>7</sup> This is important to consider because burning biogas, either in flares or in power generation equipment, is better environmentally because un-combusted methane is a potent greenhouse gas. Consequently, converting biogas to energy is not only better for the environment; it is a renewable energy source that helps the City meet the California Renewable Portfolio Standard mandate.

The Biogas Renewable Generation Project would be located within the Scholl Canyon Landfill site where landfill gas is already being collected and processed. As part of the Biogas Renewable Generation Project, the 5.5-mile pipeline connecting the landfill to the Grayson Power Plant would be decommissioned, purged, capped, and abandoned in place.<sup>8</sup>

Under CEQA, a proposal that is related to a project, but has its own "independent utility" and is not necessary for the project to proceed need not be included as part of the project description, and may be reviewed in its own CEQA document, as a separate project. *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237. Accordingly, two projects may undergo separate environmental review when the projects serve different purposes or can be implemented independently. *Banning Ranch v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223 (citing *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 99; *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 699; *Plan for Arcadia v. City Council of Arcadia* (1974) 42 Cal.App.3d, 712, 724).

In addition, CEQA review must include an analysis of the environmental effects of future expansion or other action if: "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 396. Absent these two circumstances, the future action need not be considered in the MND for the Project.

The Biogas Renewable Generation Project is a Separate Project from the Grayson Repowering Project.

The Grayson Repowering Project has independent utility from and is a separate project from the Biogas Renewable Generation Project. Biogas Renewable Generation Project is not a

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<sup>6</sup> [https://www.eia.gov/energyexplained/?page=renewable\\_home](https://www.eia.gov/energyexplained/?page=renewable_home)

<sup>7</sup> [https://www.eia.gov/energyexplained/?page=biomass\\_biogas](https://www.eia.gov/energyexplained/?page=biomass_biogas)

<sup>8</sup> See Response to Comment No. L23



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reasonably foreseeable consequence of, in no way compels or presumes completion of the Grayson Repowering Project, and is not dependent on the Grayson Repowering Project. In the same way, the Grayson Repowering Project is not dependent upon completion of the Biogas Renewable Generation Project is not a reasonably foreseeable consequence of, in no way compels or presumes completion of the Biogas Renewable Generation Project, and is not dependent on the Biogas Renewable Generation Project.

The Grayson Repowering Project objectives are to:

- Integrate with local and remote distributed renewable energy resources to provide sufficient capacity and energy to ensure reliable service at all times for the City and to support the City's compliance with California's Renewable Portfolio Standards.
- Utilize current and reliable technology and control systems to provide reliable, cost effective, and flexible generation capacity for the City to serve its customer load.
- Provide a local generation resource sufficient to meet resource adequacy requirements, and the City's obligations within the Balancing Area 7 (BA) to balance load and resource at the interconnection with the BA, in accordance with industry standards including North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) requirements; thus, providing local reliability and contributing to grid stability within the Los Angeles Basin.
- Provide sufficient locally controlled generation to minimize the City's reliance on importing power from remote generation locations through a congested transmission grid system subject to planned and unplanned outages and de-rates, making the delivery of energy to serve load less reliable than local generation.
- Replace the aged, unreliable, less efficient, high maintenance steam boilers with new, efficient, and less environmentally impactful generation technologies that meet South Coast Air Quality Management District's (SCAQMD) Rule 1304(a)(2).
- Locate the proposed Project at existing City property already permitted and used for generation to minimize the need for major infrastructure improvements such as fuel supply, water, wastewater, recycled water and transmission facilities, or the need to purchase additional property.
- Provide generation that is highly efficient to maintain reasonable cost of generation to minimize the impact on customer electric rates and help manage costs of delivering energy to the City's customers.
- Support water conservation efforts by eliminating the use of potable water for generation purposes.

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- Reduce the per megawatt-hour (MWH) creation of emissions and consumption of water. (See Final EIR, Grayson Repowering Project, Section 2.4)

In contrast, the purpose of the Biogas Renewable Generation Project is to:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment [on site];
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio;
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades;
- Build an on-site power plant utilizing LFG as fuel; and
- Abandon the existing pipeline between the landfill and Grayson Power Plant, which would in turn allow the South Coast Air Quality Management District (SCAQMD) to make priority reserve offsets available and offsets would not have to be purchased on the open market. (please refer to MND Section 1.1)

The Grayson Repowering Project will not burn landfill gas. The Grayson Repowering Project is not dependent on construction of the Biogas Renewable Generation Project. Under Glendale's existing SCAQMD permit, the landfill gas at Scholl Canyon must be flared at Scholl Canyon if is no longer capable of being combusted at Grayson. Further, there is no requirement (SCAQMD or otherwise) that mandates landfill gas be used to generate electricity, although there are environmental and economic benefits to using the landfill gas for such generation rather than flaring it.

In sum, the Biogas Renewable Generation Project and Grayson Repowering Projects would be implemented independently and would in no way depend on each other. The Biogas Renewable Generation Project could be developed with or without the repowering of Grayson, and it could be implemented or abandoned whether or not the Grayson Repowering Project is approved and implemented.

### ***The Biogas Renewable Generation Project and Grayson Repowering Project are Separate Proposals under California Energy Commission Practice***

The Biogas Renewable Generation Project and the Grayson Repowering Project are considered distinct facilities under the common practice of the California Energy Commission ("CEC"). As reflected in staff analyses and in Decisions adopted by the CEC, the CEC uses a "two-mile" analysis to assess whether facilities should be treated as one facility, or distinct facilities, for purposes of determining CEC jurisdiction. The Biogas Renewable Generation Project and the

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Grayson Repowering Project are located approximately 5.5 miles from one another and are therefore not the same “facility” according to CEC practices.

### 8.1.1.3 Topical Response 3: CEQA: Mitigated Negative Declaration vs. Environmental Impact Report

#### Summary of Comments

Several commenters believe that the Biogas Renewable Generation Project should be part of the Grayson EIR or that the Biogas Renewable Generation Project should have its own EIR.

#### Response

Per California Environmental Quality Act (CEQA) Guidelines (14 Cal. Code Regs. §§15000 et seq.) and California Public Resources Code §§21000 et seq., an initial study was prepared for the Biogas Renewable Generation Project based on available information and analysis necessary to fully evaluate potential impacts; analysis of environmental impacts is not constrained by jurisdictional boundaries. All phases of project planning, implementation, and operation were considered in the initial study of the project and all categories of environmental factors that could be potentially affected by the Project were analyzed.

The test for determining whether an EIR or a negative declaration must be prepared is whether a fair argument can be made based on substantial evidence that the project may have a significant effect on the environment. *Quail Botanical Garden Found., Inc. v City of Encinitas* (1994) 29 CA4th 1597. “Fair Argument” is a term used as a legal standard for reviewing the appropriateness of a Negative Declaration versus an EIR. Courts have held that a Negative Declaration is inappropriate if it can be “fairly argued” that the project may cause significant environmental impacts. The “fair argument” standard creates a low threshold for requiring preparation of an EIR. The “fair argument” comes into play “[i]f there is disagreement among expert opinion supported by facts, [then]... the Lead Agency shall treat the effect as significant and shall prepare an EIR” (citing 14 Cal. Code Regs., § 15064(b), (g)). “An EIR is required whenever “substantial evidence in the record supports a “fair argument” significant impacts or effects may occur.” (Quoting *City of Arcadia v. State Water Resources Control Bd.* (2006) 135 Cal.App.4th 1392, 1421.) A MND is permitted “if ‘the initial study identified potential significant effects on the environment but revisions in the project plans “would avoid or mitigate the effects to a point where clearly no significant effect on the environment would occur” and there is no substantial evidence that the project as revised may have a significant effect on the environment...’” (Quoting *Architectural Heritage Assn. v County of Monterey* (2004) 122 Cal.App.4th 1095, 1101.)

The City, as Lead Agency, applies the fair argument standard as a substantive standard in deciding whether an EIR or a negative declaration is required. The initial study determines if the project may have a significant effect on the environment. If the initial study shows that there is

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no substantial evidence that the project may have a significant environmental effect, a Negative Declaration can be prepared. If the project would cause significant environmental effects, but mitigation measures are available to reduce impacts to a less than significant level, a Mitigated Negative Declaration (MND) can be prepared. If the initial study shows there is substantial evidence in the record that supports a fair argument that significant effects may occur and that the project would cause significant environmental effects that cannot be reduced to a less than significant level with mitigation, an environmental impact report (EIR) must be prepared. The existence of controversy over the effects of a project does not require preparation of an EIR if there is no substantial evidence in the record that the project may have a significant environmental effect. (PRC §21082.2)

The initial study prepared for the Project determined, based on substantial evidence that no significant impacts would occur from Project construction, operation, or maintenance. Each public agency, including the City, is responsible for complying with CEQA and should not rely on comments from other public agencies or private citizens as a substitute for the agency's own work. CEQA Guidelines §15020. Public agencies, may delegate responsibility for CEQA compliance to its staff to prepare CEQA documentation including conducting an initial study and deciding whether to prepare a draft EIR or negative declaration as deemed appropriate by staff. (CEQA Guidelines §15025)

Comments on the proposed Mitigated Negative Declaration received during the Public Comment Period were reviewed to determine whether the comments identified any potentially significant environmental impact from the Project. The preparers evaluated all comments to determine whether any comments identified any significant environmental effects; whether the comments explained why the commenter believes that the effect would occur; and whether the comments explained why the effect would be significant (14 Cal Code Regs §15204(b)). The preparers reviewed all comments to determine whether any comments stated the basis for their comments and whether any commenters submitted supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts to support their contentions. (14 Cal Code Regs §15204(c)).

Any issues raised concerning potentially significant impacts were reviewed, and responses to all comments prepared. In addition to the individualized responses to comments, these Topical Responses were prepared to amplify and clarify information about the project for which many similar comments were submitted or inquiries made during the public comment period on the MND. As set forth in the Topical Responses and in the Responses to Individual Comments, while many comments expressed disagreement with the MND, none of the comments received presented substantial evidence of, or raised a new environmental issue about, the Project that could be "fairly argued" could result in potentially significant environmental impacts, requiring preparation of an EIR (CEQA Guidelines, Section 15064(g)). Since the Project will not result in any significant effects which cannot be mitigated to below a level of less than significance, an EIR is not required for this Project. Further, analysis of alternative developments is only mandatory as part of the EIR process; a MND does not require an alternatives analysis. Moreover, CEQA does

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not mandate that the Lead Agency accept all suggested mitigation measures or conduct every study suggested by public commenters. *A local & Reg'l Monitor (ALARM) v City of Los Angeles* (1993) 12 CA4th 1773, see also *Friends of the Kings River v County of Fresno* (2014) 232 CA4th 105.

### 8.1.1.4 Topical Response 4: Cumulative

#### Summary of Comments

Comments were received that the Draft MND did not analyze potential cumulative impacts of the Project, particularly those associated with the Landfill Expansion Project, Green Waste Anaerobic Digestion Project, and the Grayson Repowering Project.

#### Response

Lead Agencies are required to determine whether the project's incremental effect combined with the effects of other projects is "cumulatively considerable" 14 Cal Code Regs § 15130(a). This determination is based on an assessment of the project's incremental effects viewed in connection with the effects of past projects, the effect of other current project, and the effects of probable future projects. 14 Cal Code Regs § 15065(a)(3).

The City considered incremental effects of the Project in connection with effects from past, current, and probable future projects that may result in similar impacts. The projects considered in the cumulative impact analysis were the Scholl Canyon Landfill Expansion Project, Green Waste Anaerobic Digestion Project<sup>9</sup>, and the Grayson Repowering Project. The cumulative impact analysis for the Project includes consideration of these projects is included in Section 3.19(b) of the Draft MND.

The City received a letter from SCAQMD concerning cumulative air quality analysis for the Project. Response to SCAQMD's Comment letter is at Topical Response No. 6.

### 8.1.1.5 Topical Response 5: Aesthetics

#### Summary of Comments

Comments were received expressing general concern that the Project will have negative aesthetic impacts (including lighting) on areas surrounding the Project as well as areas outside of the City of Glendale. Commenters asserted that the Draft MND did not account for the Rim of the Valley Corridor Preservation Act; commenters state that the Project inaccurately characterized impacts "low visual sensitivity" within the residential setting of Glenoaks Canyon; commenters also state that selected sightlines that minimized the visual pollution that will result

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<sup>9</sup> The feasibility and possible location of the future proposed anaerobic digester facility within the Scholl Canyon Landfill site is not yet known and therefore the impacts of this future project cannot be determined with certainty. See *National Parks & Conserv. Ass'n v County of Riverside* (1996) 42 CA4th 1505; *Christward Ministry v County of San Diego* (1993) 13 CA4th 31.

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from the Project. Commenters also asserted that the aesthetic impacts of the Project and other projects—a proposed expansion of the Scholl Canyon Landfill and an anaerobic digestion project—must be analyzed together.

### Response

Section 3.1 of the Draft MND analyzes the Project impacts to Aesthetics. CEQA (Pub. Resources Code, §21000 et seq.) requires that only public views be considered in the visual impact analysis. This analysis determined that the Project would have less than significant to no impact on aesthetics/visual resources. The aesthetics impact analysis determined the following:

- There are no designated scenic vistas near the Proposed Project site or within other parts of the existing Scholl Canyon Landfill, nor are there any designated scenic vistas from which the Project would be visible.
- There are no state-designated scenic highways in the City of Glendale (California Scenic Highway Mapping System, 2017). Therefore, the Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The Project is proposed to be located within the existing boundaries of a non-fill portion of the existing Scholl Canyon Landfill. The tallest Project features will be approximately 40 feet above ground, consisting of four, approximately 18-inch outside diameter engine exhaust stacks and a flare. Project equipment will be approximately 25 feet in height. The office and warehouse space will be approximately 12 feet in height. The Project consists of improvements that would be consistent with the industrial character of the existing LFG collection system facility and the Scholl Canyon Landfill. The existing LFG collection system facility has numerous structures, trailers, and equipment distributed throughout the Project site. The Project is proposed to be designed to blend in with the surroundings which will minimize views of the Project facilities.
- The Project consists of the demolition and upgrade to an existing industrial land use that does not have any scenic views or scenic vistas or other important scenic resources that could be potentially significantly impacted. The existing LFG collection facility is presently a limited source of nighttime light and glare. Area lighting would be shielded and have light switch and motion sensors would be provided for safety at the Project facility. Lighting would be pointed downward and inward to minimize offsite impacts. All construction activities would be performed during daylight hours and would not result in an increase in offsite light or glare. The incremental amount of light and glare generated by the Project would be minimal due to the design measures incorporated into the Project, and because the Project site is located in a portion of the existing landfill with limited visibility from public viewing locations.

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The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The Glendale Municipal Code establishes ridgeline protection policy that expressly allows for the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges. (GMC section 16.08.010.G). The Scholl Canyon Landfill, including the existing LFG collection facility site which the Project will replace, is located in an area of the primary and secondary ridgelines that contains existing permitted public and quasi-public utility features. The Project's proposed power production equipment and appurtenant facilities are utility structures similar to the existing landfill gas collection system the Project will replace and similar to other operational features within the Scholl Canyon Landfill site. Portions of the Project that may be visible from offsite viewing locations, within and outside of the City of Glendale, are similar to and would be consistent with the existing views of the landfill. The MND examined all the aesthetic impact thresholds for the Project and determined that the Project will not create any new significant impacts on aesthetic resources.

Section 3.1 of the Draft MND also presents the classification of open space areas as described in the City of Glendale Open Space and Conservation Plan. Scholl Canyon is characterized as an area of "low visual sensitivity". This designation is based on the City of Glendale Open Space and Conservation Plan.

### ***Rim of the Valley Preservation Act***

Although the hills surrounding the Scholl Canyon Landfill have been included in the Rim of the Valley Preservation Act, based on review of the Rim of the Valley maps, Scholl Canyon Landfill is excluded from the proposed Rim of the Valley Unit and would not be included as part of the Santa Monica Mountains National Recreation Area. Therefore, the statement in Section 3.1.2 of the Draft MND stating that *"there are no designated scenic vistas near the Proposed Project site or within other parts of the existing SCLF, nor are there any designated scenic vistas from which the proposed Project would be visible"* is accurate because the expansion of the Santa Monica Mountains National Recreation Area is not approved, and the Scholl Canyon Landfill is excluded from the Rim of the Valley Unit. Additionally, a Fact Sheet published by Representative Adam Schiff, states that in the event the expansion of Santa Monica Mountains National Recreation Area is approved it would respect "private property rights and existing local land use authorities. It will not require a land owner to participate in any conservation or recreation activities, and it will not put any additional restrictions on property owners. The bill does not allow for land acquisition through eminent domain." Therefore, by intentionally excluding the Scholl Canyon Landfill from the proposed Rim of the Valley Unit and since there is no intent to restrict property rights, it can be concluded that permitted activities within the Scholl Canyon Landfill would not be subject to the restrictions envisioned under the proposed Rim of the Valley Preservation Act.



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### **8.1.1.6 Topical Response 6: Air Quality / Greenhouse Gases**

#### **Summary of Comments**

Comments received expressed concern in regard to:

- What appears to be the use of emission offset credits to justify the project, while ignoring local air quality ("... trading these pollutants with credits so it wipes out the emissions on paper only.").
- The air quality study conducted for the Biogas Renewable Generation Project did not include existing emissions at the Scholl Landfill.
- Cumulative impacts of the Grayson Repowering Project and the Scholl Canyon Landfill Expansion Project were not addressed.
- Air quality impacts from temporarily flaring landfill gas.
- Health risks for local populations, including local commercial and residential receptors.
- The need to burn landfill gas.
- The inclusion of GHG emissions resulting from landfill gas combustion at Grayson in the Biogas Renewable Generation Project baseline conditions.

#### **Response**

##### ***SCAQMD Regulatory Program for New Sources***

Emission offsets are only one of the three mandates by SCAQMD and US EPA that apply to the construction of an emission source, such as the Biogas Renewable Generation Project. Those mandates require that best available control technology (BACT) be used to reduce emissions to the lowest achievable emission rate (LAER), that no net emission increase in the South Coast Air Basin (managed through the use of emission offsets) occur, and that air quality analysis using approved models demonstrate that a new source would not result in significant local air quality impacts. These mandates are collectively referred to as New Source Review or NSR. Compliance with each of the three NSR mandates must be made independently and in no case is compliance with one mandate (such as the requirement to offset emission increases) a substitution for compliance with the other mandates, such as the prohibition against causing a violation of, or significantly worsening a violation of, ambient air quality standards. Failure to comply with any of the three mandates will disqualify the Project from SCAQMD construction and operating permits. The following sections of this Topical Response summarize the three NSR mandates as applied to the Project.



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### BACT / LAER

NSR requires that new emissions sources that are part of the Project incorporate current BACT and meet LAER. This is accomplished by utilizing highly efficient biogas internal combustion engines combined with effective post-combustion emission control technology. The technology selected for the Project is highly effective at reducing emissions.

### No Net Emission Increase

The NSR requires that, on a regional basis, no increase in nonattainment pollutants or their precursors would result from the Project. This provision applies to emissions of NO<sub>x</sub>, VOC, PM<sub>10</sub> / PM<sub>2.5</sub> and SO<sub>x</sub>. CO emissions do not require offsets because the South Coast Air Basin is in attainment with both state and federal ambient CO standards. Even with the application of BACT, however, any proposed project could result in an increase in these emissions. The Federal Clean Air Act and SCAQMD permitting policy recognize that a blanket prohibition of new emission sources in any community would be harmful to the wellbeing of the community. To provide a vehicle for managing no net increase in regional emissions with the need to build new sources to address community need, both US EPA and SCAQMD allow for the use of emission offset credits. The offset credit program allows SCAQMD or permit holders to generate an instrument reflecting a real, permanent and quantifiable emission reduction. The instrument can then be used to offset an emission increase at an existing or new facility.

Emission offsets for the proposed Project include verified and quantifiable emission reduction credits that are held in the SCAQMD Priority Reserve, which is established to provide offset credits for specific priority sources that must be operated to ensure public safety and wellbeing. Landfill gas naturally generated by the Scholl Canyon Landfill is required to be handled through a gas collection and combustion system without which the operation would be in violation of federal and SCAQMD regulations and would contribute to emissions of GHGs, VOCs and toxic pollutants. Because the city must combust landfill gas to comply with regulations and ensure public safety, and because of the City's role as a public agency, the Project is eligible to receive SCAQMD Priority Reserve credits. The requirement to offset increases in nonattainment pollutants or their precursors ensures that there would be no net increase of these air pollutants in the South Coast Air Basin from the Project, nor would it conflict with the implementation of SCAQMD's air quality management plan.

### Ambient Air Quality Demonstration

The third component of NSR is a required demonstration that a new emission source will not cause a violation of, or significantly add to an existing violation of, state or federal ambient air quality standards. Although the Project meets BACT / LAER to reduce potential emissions and is fully offset to ensure no net increase in nonattainment pollutants, Glendale Water and Power (GWP) must independently demonstrate that the Project will not cause or significantly add to a

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violation of state and federal ambient air quality standards for NO<sub>2</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub> and SO<sub>x</sub> (there are no ambient VOC standards).

The Draft MND contains results of the air quality impact analysis that was prepared for the Project and which demonstrates compliance with NSR requirements. The analysis was conducted using tools that are mandated by US EPA and in accordance with policies and protocol established by SCAQMD. Prior to initiating the analysis, the City submitted an analysis protocol to SCAQMD for comments and approval; and SCAQMD approved the City's analysis protocol for this Project. During the analysis process, the City continued to confer with SCAQMD. SCAQMD has subsequently approved the analysis and its results.

### New Source Review (NSR) Summary

SCAQMD requires that three independent NSR demonstrations be made. They include demonstrations that the Project: 1) will use BACT and meet LAER to minimize emissions to the greatest degree possible, 2) does not result in an increase in regional emissions through the use of emission offsets, and 3) does not result in a violation or significant increase to an existing violation of an ambient air quality standard. These demonstrations support not only the CEQA analysis contained in the Project Draft MND but must also be met for SCAQMD to issue construction and operating permits for the Project. The Draft MND demonstrates that all three demonstrations have been successfully made for the Project.

### ***Air Quality Impact from the Existing Emissions at the Landfill and Other Proposed Projects (Landfill Expansion Project and Anaerobic Digester Project)***

#### Existing Emissions at the Landfill

The current landfill activities that may generate emissions include off road equipment, vehicles, and stationary sources, which include the existing flares, portable engines, storage and dispensing system, and consumer products, such as paints, sealants, and cleaners. These existing emissions are part of the background concentration of criteria pollutants in the ambient air quality analysis of the Draft MND. The background concentrations were added to the criteria air pollutants concentration of the proposed Project in order to analyze the impact to the localized ambient air quality. As shown in the Draft MND, the total criteria pollutant concentrations are below the state and national ambient air quality standards.

#### Scholl Canyon Landfill Expansion

There are two variations of expansions evaluated in the Scholl Canyon Landfill Expansion Draft EIR. Variation 1 only includes vertical expansion; Variation 2 includes both vertical and horizontal expansion. According to Scholl Canyon Landfill Expansion Draft EIR, Variation 1 and 2 would result in a NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emission increase that exceeds the significance mass daily thresholds. The following table shows the daily emission increase of criteria air pollutants from the Scholl Canyon Landfill Expansion Project.

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<b>Project</b>	<b>NO<sub>x</sub>, lbs/day</b>	<b>CO, lbs/day</b>	<b>VOC, lbs/day</b>	<b>PM10, lbs/day</b>	<b>PM2.5, lbs/day</b>	<b>SO<sub>x</sub>, lbs/day</b>
Expansion Project – Variation 1	332.0	119	27.6	459.2	56.0	0.6
Expansion Project – Variation 2	332.3	119.6	27.6	459.3	56.0	0.6

For the Biogas Renewable Generation Project, air dispersion modeling was performed using the worst-case scenario emission rates for each criteria air pollutant based on average time of each pollutant standards (1-hour average, 8-hour average, 24-hour average, and annual average). The maximum daily emissions of criteria air pollutants used for the model were estimated as follow:

<b>Project</b>	<b>NO<sub>x</sub>, lbs/day</b>	<b>CO, lbs/day</b>	<b>VOC, lbs/day</b>	<b>PM10, lbs/day</b>	<b>PM2.5, lbs/day</b>	<b>SO<sub>x</sub>, lbs/day</b>
Biogas Renewable Generation Project	420	1,132	126	58	58	80

Emissions from the Project are primarily emitted from point sources (the engine exhaust stacks and flares), while emissions from the landfill occur over a much larger area and from vehicles operating on public roadways to access the landfill. While the Draft EIR for the Landfill Expansion Project indicated “possible significant impacts” for NO<sub>2</sub>, PM10 and PM2.5, that determination was based solely upon comparison of potential emissions to SCAQMD regional significance thresholds and localized significance thresholds. No refined air quality impact analysis was conducted for the Landfill Expansion Project, even though such an analysis often provides additional data that may support a less than significant determination. The Draft EIR for the Landfill Expansion Project further relied on the application of SCAQMD localized significance impact lookup tables that are not designed for projects as large as the Scholl Canyon Landfill. This approach is conservative for determining localized air quality impacts as the Draft EIR for the Landfill Expansion Project assumed that the total increase in emissions shown above would occur within a five-acre area located within proximity to a sensitive receptor. In fact, the total emissions increase from the Landfill Expansion Project would be spread across the larger landfill site as well as roadways used for landfill access that would lead to greater dispersion not quantitatively analyzed in the Draft EIR for the Landfill Expansion Project.

## NO<sub>x</sub> Cumulative Impact

Under CEQA Guideline Section 15064(h), the test for determining whether a project results in a significant cumulative impact is whether a project makes a cumulatively considerable contribution to a significant cumulative impact. Under the CEQA Guideline, if the project makes no contribution to the impact in question, such contribution is not cumulatively considerable, and the project does not result in a significant cumulative impact. The Biogas Renewable Generation Project is required by existing law to offset any new NO<sub>x</sub> emissions from stationary sources, such that the Project will not result in any overall increase in NO<sub>x</sub> emissions. Therefore, on

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a regional basis the Project does not contribute to any cumulative impact related to NOx emissions.

On a localized basis, the Project has much higher NOx emissions than the Landfill Expansion Project. As shown above, the Biogas Renewable Generation Project would have a maximum of 420 pounds/day NOx emissions. Variations 1 and 2 of the Landfill Expansion Project would result in an approximately 332 pounds/day increase in NOx emissions. However, approximately 218 pounds/day, or 66% of this increase in NOx emissions would occur from motor vehicles operating on public roadways to access the landfill. The remaining 34% increase in NOx emissions associated with the Landfill Expansion Project would be spread across the larger landfill site and have greater dispersion than NOx emissions associated with the point source location of the Biogas Renewable Generation Project (Scholl Canyon EIR / Appendix F, 2014).

The air quality impact analysis results for the Project presented in Table 3.3-17 of the draft NND, however, indicate that the point source emissions from the Project do not contribute significantly to ambient concentrations or lead to an exceedance of air quality standards. The low off-site ambient concentrations from the Project in consideration of Landfill Expansion Project emissions occurring over a much larger area across the landfill and access roads indicate that on a localized level, it would not have a cumulatively considerable contribution to a significant NO2 impact.

### PM10 Cumulative Impact

Like NOx, the Biogas Renewable Generation Project is required by existing law to offset any new PM10 emissions, such that the biogas project will not result in any overall increase in PM10 emissions. Therefore, on a regional level, the project does not contribute to any cumulative impact related to PM10 emissions.

On a localized basis, as shown in the above tables PM10 emissions from the Project are less than 13 % of PM10 emissions from the Landfill Expansion Project. The incremental contribution of PM10 emissions from the Biogas Renewable Generation Project as a point source location compared to those associated with the Landfill Expansion Project that would occur over a much larger area and access roads indicate that on a localized basis, the Project would not have a cumulatively considerable contribution to a significant PM10 impact.

### PM2.5 Cumulative Impact

As shown in the above tables, the peak daily emissions of PM2.5 from both projects are fairly close (The Biogas Renewable Generation Project has 4 percent higher daily emissions of PM2.5 relative to the Scholl Canyon Landfill Expansion Project). The result of the air dispersion model for the Biogas Renewable Generation Project of PM2.5 is around 42 percent of the allowable increase of 2.5 ug/m<sup>3</sup> (Draft MND, Table 3.3-17). The incremental contribution of PM2.5 emissions from the Biogas Renewable Generation Project as a point source location compared to those

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associated with the Landfill Expansion Project that would occur over a much larger area and access roads indicate that on a localized basis, the Project would not have a cumulatively considerable contribution to a significant PM<sub>2.5</sub> impact.

### CO Cumulative Impact

Based upon the above tables, the CO daily emissions from the Biogas Renewable Generation Project are much higher than the Landfill Expansion Project, and nevertheless, the Biogas Renewable Generation Project CO emissions were determined to be below the significance threshold through an air dispersion model and air quality impact analysis. The CO daily emissions from the proposed Scholl Canyon Landfill Expansion Project were also determined to be below the significance thresholds (Scholl Canyon Draft EIR, Table 6.2-8, 2014). Considering these determinations as well as that CO emissions from the Project would occur from a point source location compared to those associated with the Landfill Expansion Project that would occur over a much larger area and access roads indicate that on a localized basis, the Project would not have a cumulatively considerable contribution to a significant CO impact.

### VOC and SO<sub>x</sub> Cumulative Impact

The daily VOC and SO<sub>x</sub> emissions from the Landfill Expansion Project were determined to be below the significance threshold (Scholl Canyon Draft EIR, Table 6.2-8, 2014). Based upon the above tables, when VOC and SO<sub>x</sub> emissions from the Project are added to emissions from the Landfill Expansion project, the combined emissions are also below significance thresholds. The Project does not have a cumulatively considerable contribution to a significant cumulative impact relating to VOC and SO<sub>x</sub> emissions.

### Anaerobic Digester Project

See Topical Response No. 4. The proposed Anaerobic Digester Project is in a concept and design feasibility phase; it is therefore not yet defined to a point that is sufficiently stable to permit a project-level air quality analysis or cumulative air quality impact analysis that would yield anything other than speculative results.

### ***Air Quality Impact When the Landfill Gas Pipes to Grayson Power Plant Disconnected and the Landfill Gas will be Flared during the Construction Period.***

During the construction phase of the Biogas Renewable Generation Project, the landfill gas piping system to Grayson Power Plant will be decommissioned, purged, capped, and abandoned in place and, as required by law and authorized by existing permits, the landfill gas will be combusted in the existing flare system to control fugitive VOC and methane emissions. The net increase of daily emissions during the construction phase, which include emissions from the flare, were calculated to be less than applicable significance thresholds. The City is currently combusting landfill gas from the Scholl Canyon Landfill and this Project does not increase the volume of gas being combusted. SO<sub>x</sub> emissions are largely fuel-dependent and not technology-

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dependent therefore the SO<sub>x</sub> emissions rates from combusting landfill gas – whether in a flaring system or boiler system is expected to be the same. However, flare and boiler combustion systems are expected to have different emission rates of the other criteria pollutants. The following table shows the comparison of the calculated landfill gas emission factors between flares and boilers.

As outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B guidance, and the data have been collected within the preceding 3 years. Use of these data is therefore appropriate for the Project analysis.

Equipment	NO <sub>x</sub> , lbs/mmcf	CO, lbs/mmcf	VOC, lbs/mmcf	PM10, lbs/mmcf
Flares	13.27	1.19	1.30	6.40
Boilers	9.79	7.1	4.00	8.00

Additionally, a health risk assessment was performed to determine the increased health risk from the flaring operations. As indicated in the Draft MND, the highest health risk levels attributed of the flares are below the significance thresholds.

### **Potential Hazardous Air Pollutants and Health Risk**

Local health risks are minimized due to the technology being proposed for the Project and also due to the large area of the landfill and surrounding open space. The Draft MND contains results of a health risk assessment that was used to determine if increased health risks from the Project exceed significance thresholds established by OEHHA and SCAQMD. That assessment identified the highest risk levels of any receptor location outside the landfill boundary and demonstrated that expected health risks are below the established significance thresholds.

### **Greenhouse Gases**

#### **Need to Burn Landfill Gas and Relative Greenhouse Gas Emissions**

Several commenters expressed concern regarding the need to burn landfill gas and the resulting greenhouse gas (GHG) emissions from the Project.

Un-combusted landfill gas contains GHG emissions including carbon dioxide and methane. Based upon historic landfill gas analyses and gas production rates, the Scholl Canyon Landfill

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produces approximately 42,000 metric tons of carbon dioxide and 16,000 metric tons of methane annually. Methane emissions are especially important because the global warming potential of methane is approximately 25 times greater than that of carbon dioxide. In other words, 16,000 metric tons of methane emissions are equivalent to approximately 400,000 metric tons of carbon dioxide emissions, when considering global warming potential impacts. When both the methane and carbon dioxide content of the landfill gas is considered, Scholl Canyon Landfill generates approximately 440,000 metric tons of CO<sub>2</sub>e per year.

The combustion of landfill gas is an effective way to destroy methane emissions and lower overall GHG emissions from landfill operations. Based upon projected emissions for the Project, methane emissions from the combustion of Scholl Canyon Landfill gas are expected to be approximately 3.5 metric tons per year –the Project would reduce methane emissions by more than 99%. The final CO<sub>2</sub>e emissions of the Project comprised primarily of carbon dioxide and methane and are estimated to be approximately 58,000 metric tons per year, an overall 86% reduction from the un-combusted landfill gas.

### **Inclusion of Grayson Power Plant Greenhouse Gas Emissions in an Analysis of Baseline Conditions**

Several commenters expressed concern regarding the consideration of historic GHG emissions from the Grayson Power Plant as a baseline for determining significance of the Project.

In determining whether a project's impacts are significant, the MND compares project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the project at the time project environmental analysis commences (at time of notice of preparation or commencement). The lead agency has the discretion to treat historical conditions or conditions that predate publication of the notice of preparation or commencement of the analysis as the baseline for analyzing impacts if there are reasons for doing so that are supported by substantial evidence. In this case the area affected by GHG emissions is global in scope and the impacts are not dependent upon the precise location of the GHG emission sources.

The Project serves to combust landfill gas that is generated by the Scholl Canyon Landfill. Through the combustion process, the Project serves three purposes. First, the Project destroys methane emissions and reduces greenhouse gas emissions as discussed in the preceding section of this document. Second, the Project also destroys volatile organic gases (VOCs) and organic hazardous compounds through the combustion process. Third, the Project uses the renewable energy produced through the combustion of landfill gas to create electricity. All three of these functions currently occur through the burning of Scholl Canyon Landfill gas in the Grayson Power Plant boilers.

The Project will consume landfill gas from the Scholl Canyon Landfill that is currently combusted at the existing Grayson Power Plant. Implementation of the Project will result in that same landfill gas being combusted at Scholl Canyon, accordingly the Project will not increase the amount of



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landfill gas being produced or combusted and does not alter the ultimate impacts of GHG emissions from combusting the landfill gas. (See Air Quality and GHG emissions information herein above in this Topical Response). In addition, if the Project were not built and Grayson operations should cease, the Scholl Canyon Landfill gas would be incinerated in the existing landfill flares.

### **8.1.1.7 Topical Response 7: Geology and Soils**

#### **Summary of Comments**

Comments received expressed concern in regard to:

- Pollution doesn't just stop at the border of Glendale or even Eagle Rock. The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipelines rupture, the gas and explosions won't magically stop at a city line; if there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected.
- If there were a fire or earthquake how would the power plant and Cal Edison's power lines be protected?
- Scholl Canyon is a 56-year old unlined municipal waste facility located on highly fractured, shattered bedrock. It operated for almost 15 years before the Environmental Protection Act, so there were few if any controls over the material deposited in the landfill. There is continuing evidence that volatile organic compounds and other contaminants have seeped below the subsurface barriers and have flowed to the west of the landfill.
- The report shows six active faults within ten miles of the Project site. The Verdugo fault is 0.3 mile away, and three others are less than five miles from the Project. All six faults have a magnitude maximum estimate of 6.7 to 7.2 (2008 National Seismic Hazards maps, USGS, 2008). What specific mitigations will the project make to prevent gas and water line breaks, slides on exposed faces of the landfill, and liquefaction at Scholl Canyon Park, also the site of the proposed gas link?
- The report states, "Landslide hazard zones are most likely on the steep slopes upon which Scholl Canyon Road is located." No mitigation is offered to protect customers and emergency responders on that road in an earthquake or fire emergency when it might be difficult to reach the power station.
- There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children



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play, there are several homes within meters, and children's baseball fields are located Form Letter (#24).

- There is an earthquake fault line running under the Scholl Canyon landfill. In the event of an earthquake will the gas facility erupt into explosions and fire endangering nearby residents? How will the City of Glendale protect the gas facility and nearby structures from such an occurrence?

### Response

In determining whether a project's impacts are significant, the MND compares project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the project at the time project environmental analysis commences (at time of notice of preparation or commencement). Assessment of the project's impacts is normally limited to changes in those existing physical conditions in the area affected by the project. (14 Cal Code Regs section 15125(a) Accordingly, CEQA does not limit environmental analysis by jurisdictional boundary.

As stated in the Draft MND, the closest earthquake fault is the Verdugo Fault located 0.3 miles to the southwest of the Project site. Based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Project site during design life of the proposed development. Additionally, due to the subsurface conditions underlying the Project site consisting mainly of dense to very dense silty sands over slightly weathered, hard bedrock, combined with very deep groundwater levels in an area where water bearing soils are not present, the potential for liquefaction beneath the Project site is negligible and potential impacts due to liquefaction were determined to be less than significant as stated in the Draft MND in Section 3.6.2.

There may be as yet undiscovered faults that are not and were not mapped in 1952 or in 1989. Nonetheless, the Project is being constructed to comply with California Building Code, ASCE 7, and Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facilities and structures. The current building and safety code standards that address seismic risk have much improved since 1952. The Draft MND thoroughly analyzes seismic risk based on the most current data in light of the CEQA threshold.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND and is not required by CEQA.

As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the applicable California Building Code, ASCE 7, and the Glendale Building and Safety Code which considers the risk of seismic events impacting facility structures. All structures will be

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designed in accordance with the current edition of the California Building Code and Glendale Building and Safety Code that is in effect at the time the facility is designed and not to codes or standards that have yet to be adopted or go into effect. The California Building Code (CBC) 2016 edition references ASTM 7-10. The next edition of the CBC (CBC 2019) will then reference ASTM 7-16.

### ***Potential Leakage of Dangerous Contaminants from the Dump***

The construction of the Biogas Renewable Generation Project will include automatic seismically triggered shutoff valves on both the new natural gas line at the meter box and on the connection to the existing landfill gas pipeline that will shut off the flow of gas in the event of a seismic event. Therefore, there will be a less than significant potential for a gas leak and explosion at the Biogas Renewable Generation Project as the result of an earthquake.

### ***Impact of an Earthquake on the Electrical Line***

No new electrical transmission lines would be constructed as part of the Project. The electrical connection of the Project would be to existing Glendale Water and Power 12.45 kV distribution line currently serving the existing equipment at the landfill. Distribution lines, as well as transmission lines, are protected with relays that automatically trip and disconnect a line when a fault in the line occurs. The Project would not connect to the Cal Edison's power lines.

### ***Volatile Organic Compounds and Other Contaminants Have Seeped Below the Subsurface***

The Biogas Renewable Generation Project would not be located on top of the existing landfill material deposits but would be located on very dense silty sands over slightly weathered, hard bedrock and would not have any foundation or other facilities that would penetrate the landfill or have any impact on volatile organic compounds and other contaminants seeping below the subsurface.

### ***Fault Rupture Hazard***

As specified in Appendix D: Geotechnical Investigation Report (pg. 673 of the Draft MND), the Project is not located within a currently mapped California Earthquake Fault Zone. While the nearest fault is the Verdugo Fault, located approximately 0.3 miles southwest of the site, based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Site during the design life of the proposed development.

### ***Landslide Hazard Zone – Scholl Canyon Road***

The existing Scholl Canyon Road would be the main access to the Project and in the event that the road is lost as the result of a seismic event, access to the plant would be via Sanitation District dirt roads. However, since the plant is neither a must run facility or a critical facility and will have automatic gas shutoff valves installed as part of the design of the Project, the plant will be automatically shut down. Access to the plant by City operators is not critical as automatic safety systems and shut offs are incorporated into the facility design and operation.

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### ***Liquefaction and Seismically Induced Settlements***

Subsurface conditions underlying the site consist mainly of dense to very dense silty sands over slightly weathered, hard bedrock. In addition, the groundwater level is very deep. The Project is located in an area where water bearing soils are not present. Consequently, the potential for liquefaction beneath this Project is negligible.

The Biogas Renewable Generation Project is located approximately half a mile from the Scholl Canyon Park on solid bedrock and the Project would have no effect on any geological or soil conditions at Scholl Canyon Park.

See Section 7.0 Conclusions and Recommendations of Appendix D Geotechnical Investigation Report, for specifics on Foundation Design, Foundation Construction, Concrete Slab-on-Grade Floors, Permanent Retaining Walls, Pavement Design, Expansive Soil Potential, Corrosive Soil Potential, Site Preparation and Grading, and Post Investigation Services in place to support the design and construction of the Project.

### ***Compliance with Seismic Hazards Mapping ACT***

The Biogas Renewable Generation Project would not house any structures for human habitation in accordance with the California Building Code. However, the facility would be constructed with a battery uninterruptable power source designed to provide sufficient power to allow for the safe shutdown of the Project in the event of an emergency.

## **8.1.1.8 Topical Response 8: Hazards and Hazardous Materials**

### **Summary of Comments**

Comments were received stating concern that the Project could result in a fire, explosion and/or release of hazardous materials would create a substantial hazard to public and property.

### **Summary of Response**

The Project includes a fire protection system that complies with all applicable national, state, and local fire codes. The fire protection system has been reviewed and approved by the City of Glendale Fire Department, as the Certified Unified Program Agency. The Potential Impact Radius of an explosion originating from the proposed natural gas pipeline is 9.26 feet. Considering that there are no residences or other habitable structures within the Potential Impact Radius and the pipeline is in a location not open to public access, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. The City proposes to replace anhydrous ammonia with R134a refrigerant or equivalent as allowed by CARB and SCAQMD, in the chiller system and use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions. Use of R134a refrigerant, or equivalent, and 19-percent aqueous ammonia would not create any new environmental impacts, worsen the effect of any environmental impacts, or require mitigation measures. The revisions to the Draft MND made in the attached Errata do not meet the definition of a substantial revision requiring recirculation.

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### Response

#### **Fire Hazard**

Comments were received that the Project has unacceptable fire hazard risks due to its location and use of flammable materials such as landfill gas and natural gas.

#### Location in Very High Fire Hazard Zone

As noted in Section 3.8 of the Draft MND, the Project site is located within a very high fire hazard zone. Despite the designation, the site itself has little wildfire potential due to the large areas with little or no native vegetation (fuel). Also, per Glendale Fire Prevention regulations, proper vegetation management procedures such as weed abatement and brush clearance programs are required and will be implemented.

#### Landfill Gas Release/Fire

The landfill gas is flammable, but barely, so a release would be unlikely to spontaneously combust. Landfill gas is currently treated at Scholl Canyon Landfill and the Project would result in landfill gas continuing to be treated at Scholl Canyon Landfill. There is the potential that one of the landfill gas treating vessels could fail due to internal corrosion resulting in a release of landfill gas. However, at an operating pressure less than ten pounds per square inch gauge which is below the 15 pounds per square inch gauge pressure rule applicability threshold the State of California uses for requiring pressure vessels to meet construction and code stamping requirements. For comparison, the International Football Association Board requires soccer balls to have a pressure between 8.5 and 14.7 pounds per square inch (IFAB, 2017)<sup>10</sup>. At a pressure of less than 10 pounds per square inch the danger of a serious explosion from a landfill gas treating vessel is virtually non-existent. While this standard is not applicable to the Project by regulation, the City is requiring that all vessels be code stamped and rated for a much higher pressure. Considering that the site is already used for landfill gas treatment and the low pressures associated with such treatment activities, the fire hazard of the Project from landfill gas treatment would be similar to or lower than existing conditions.

Currently, the landfill gas is compressed at the Scholl Canyon Landfill for transmission through the 5.5-mile-long pipeline to Grayson Power Plant for power generation, or is alternatively combusted at the landfill in a flare. Because the Project includes decommissioning the landfill gas pipeline between Scholl Canyon Landfill and Grayson Power Plant, the landfill gas would no longer be compressed for pipeline transmission. While the Project does include landfill gas compression associated with operating the power generation equipment, the compression pressure would be lower than that currently existing at the Scholl Canyon Landfill. Comparatively, the fire hazard of the Project from landfill gas compression would be similar or lower compared to existing conditions. In fact, thirteen pounds per square inch gauge is the

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<sup>10</sup> International Football Association Board, 2017, Laws of the Game 2017/18, available at: [https://football-technology.fifa.com/media/1245/lotg\\_17\\_18\\_en.pdf](https://football-technology.fifa.com/media/1245/lotg_17_18_en.pdf)

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highest landfill gas compression expected with the Project, which is below the 15 pounds per square inch gauge pressure rule applicability threshold the State of California uses for requiring pressure vessels to meet construction and code stamping requirements. For comparison, the International Football Association Board requires soccer balls to have a pressure between 8.5 and 14.7 pounds per square inch (IFAB, 2017)<sup>11</sup>.

The engines that would combust landfill gas for power generation are an additional source of potential fire. The most probable source of fire would be a lube oil fire. However, because the engines would be contained in steel enclosures equipped with fire suppression systems they would not represent a substantially increased risk of fire compared to existing conditions.

The electrical generating combustion engines would be placed in fire protection enclosures with fire suppression systems and electrical equipment would be placed in enclosures insulated with an inert gas. The existing flares would remain and do not represent a new source of potential wildland fire.

Additionally, the proposed facilities include a fire protection system that consists of a new 60,000-gallon water tank, water conveyance piping, two fire hydrants, and fire protection sprinklers inside buildings. The proposed fire protection system was designed to meet National Fire Protection Agency and California Fire Code requirements. The City of Glendale Fire Department, as the Certified Unified Program Agency has reviewed and approved the Project's fire protection design which includes verifying compliance with all applicable national, state, and local fire codes. As a result of these fire protection measures, potential impacts from a fire, and as discussed in Section 3.8 of the Draft MND, were determined to be less than significant.

The Project does not create a new risk of fire or explosion than what currently exists. As mentioned above in the Topical Response, the landfill gas is currently compressed to a higher pressure than would be required for the Project. Any risk associated with compressed landfill gas will be lower with Project implementation compared to existing conditions. The highest landfill gas pressure produced as the result of the Project will be about 13 psig. This is below the pressure that the State of California requires pressure vessels to be code stamped. For comparison, the International Football Association Board requires soccer balls to have a pressure between 8.5 and 14.7 pounds per square inch (IFAB, 2017)<sup>12</sup>. However, the City will require all vessels to be code stamped and rated for a much higher pressure as a matter of additional safety. In the unlikely event that one of the treating vessels could fail due to internal corrosion, because pressures are less than 10 psig, the danger of a serious explosion is virtually non-existent. (Which is why the state does not require these vessels to be stamped). As previously mentioned, landfill gas is barely flammable, so a release would be unlikely to result in spontaneous combustion. A

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<sup>11</sup> International Football Association Board, 2017, Laws of the Game 2017/18, available at: [https://football-technology.fifa.com/media/1245/lotg\\_17\\_18\\_en.pdf](https://football-technology.fifa.com/media/1245/lotg_17_18_en.pdf)

<sup>12</sup> International Football Association Board, 2017, Laws of the Game 2017/18, available at: [https://football-technology.fifa.com/media/1245/lotg\\_17\\_18\\_en.pdf](https://football-technology.fifa.com/media/1245/lotg_17_18_en.pdf)

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release would be no more likely to occur in the future than now. The engines are contained in steel enclosures equipped with fire suppression systems.

### ***Explosion Hazard from Natural Gas and Existing Biogas Pipeline***

The Project's three-inch diameter natural gas pipeline would be designed in accordance with applicable pipeline safety standards and would be installed above ground except for road crossings. United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration developed an equation that estimates the distance from a potential natural gas pipeline explosion at which death, injury, or significant property damage could occur. This distance is known as the "Potential Impact Radius". The Potential Impact Radius is calculated by the formula  $r = 0.69 * (\text{square root of } (p * d^2))$ , where 'r' is the radius of a circular area in feet surrounding the point of pipeline failure, 'p' is the maximum allowable operating pressure in the pipeline in pounds per square inch and 'd' is the nominal diameter of the pipeline in inches.

The natural gas pipeline proposed as part of the Project would have a maximum operating pressure of 20 pounds per square inch and a diameter of three inches. The distance from an explosion at which death, injury, or significant property damage could occur is 9.26 feet. Considering that there are no residences or other habitable structures within the Potential Impact Radius and the pipeline is in a location not open to public access, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. The Project would result in decommissioning the existing 5.5-mile-long landfill gas pipeline from the Scholl Canyon Landfill to Grayson Power Plant. That pipeline has a maximum operating pressure of 50 pounds per square inch, a diameter of 14 inches, and a resulting distance from a potential explosion at which death, injury, or significant property damage could occur of 46 feet (Compliance Services Inc., 2016)<sup>13</sup>. Implementation of the Project includes decommissioning the existing landfill gas pipeline and therefore reduce risks associated with a potential explosion from that pipeline.

### ***Ammonia Hazard***

The Draft MND for the Project evaluated the potential hazards associated with a proposed 3,000-gallon capacity anhydrous ammonia refrigerant chiller system. The proposed facility cooling system would have contained less than 10,000 pounds of anhydrous ammonia and risks from an upset condition were determined to be low. However, it has been determined that the anhydrous ammonia would be replaced with R134a refrigerant, or equivalent, which is an alternative refrigerant to and lacks the hazards associated with anhydrous ammonia. This substitution eliminates potential hazard associated with anhydrous ammonia and would not create any new environmental impacts, worsen the effect of any environmental impacts, or add mitigation measures. The Biogas Renewable Generation Project would use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions of nitrogen oxides from the generation equipment. The 19-percent aqueous ammonia would be stored in

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<sup>13</sup> Compliance Services Inc., 2016, Part 192 Jurisdictional, Class Location, & High Consequence Area Analysis, Scholl Canyon Landfill Biogas Pipeline. Note: Calculation of Potential Impact Radius considers a natural gas factor specific to the landfill gas).



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up to a 12,000-gallon capacity above ground storage tank. The tank would be surrounded by a secondary concrete containment structure that measures 38.5 feet long, 13.5 feet wide and 4.5 feet deep. The secondary containment structure can hold the entire contents of the tank, plus rain water accumulation. The California Accidental Release Program regulates the use of aqueous ammonia with a concentration of 1 percent or greater if a threshold quantity of 500 pounds of ammonia is reached.

In response to comments received on the Draft MND related to accidents involving hazardous materials and potential risks to the public, an offsite consequence analysis has been subsequently performed for the accidental release of aqueous ammonia using the U.S. Environmental Protection Agency approved Lawrence Livermore National Laboratory Atmospheric Dispersion Model for Denser-Than-Air-Releases (SLAB Model) . The analysis assumed the complete failure of the storage tank, the immediate release of the contents of the tank and the formation of an evaporating pool of aqueous ammonia within the secondary containment structure. Under this scenario, evaporative emissions of ammonia would be subsequently released into the atmosphere. The dispersion and transport of these emissions into the atmosphere would be subject to meteorological conditions at the time of the release. To be conservative, worst-case meteorological data were used in the offsite consequence analysis pursuant with U.S. Environmental Protection Agency's Risk Management Program Guidance for Offsite Consequence Analysis (EPA, 2009)<sup>14</sup>.

To provide a conservative analysis of potential offsite consequences of an ammonia release, a concentration of 75 parts per million ammonia considered by the CEC to be the concentration the public could be exposed to during a one-time event without experiencing serious adverse effects was used for screening purposes. For comparison, the Occupational Safety and Health Administration's Immediately Dangerous to Life and Health concentration for ammonia is 300 parts per million and U.S. Environmental Protection Agency's Accidental Release Prevention Program Toxic Endpoint concentration for ammonia is 200 parts per million. As it relates to the Project, a concentration of ammonia exceeding 75 parts per million beyond the Scholl Canyon Landfill property boundary would be considered a potentially significant impact.

The results of the offsite consequence analysis for the worst-case release of ammonia indicate that the 75 parts per million concentration, would extend approximately 150 feet from the ammonia tank/release. This distance would not extend beyond the Scholl Canyon Landfill property boundary, and therefore such a condition represents a low public safety risk, and would be a less than significant impact not requiring any mitigation.

Section 15073.5 of the CEQA Guidelines states a lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given, but prior to its adoption. A "substantial revision" means:

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<sup>14</sup> EPA. 2009. Risk Management Program Guidance for Off-site Consequence Analysis. Available: <https://www.epa.gov/sites/production/files/2013-11/documents/oca-chps.pdf>.



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- (1) A new, avoidable significant effect is identified, and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

As demonstrated in the discussion above, replacement of anhydrous ammonia with R134a refrigerant or equivalent, in the chiller system and use of 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions would not result in a substantial revision to the Draft MND and would not require recirculation.

### **8.1.1.9 Topical Response 9: Noise and Transportation and Traffic**

#### **Summary of Comments**

Comments received stated concern regarding the potential for noise and transportation and traffic impacts during Project construction and operation. Comments included concern for exacerbating the use of the Figueroa corridor during construction, Los Angeles County Operational Area Disaster Routes being impacted in the event of a major accident at Scholl Canyon Landfill, public safety related to an increase in truck traffic, illegal dumping in residential neighborhoods adjacent to the landfill, and cumulative traffic impacts.

#### **Response**

##### Noise and Transportation Impacts and Discussions in Draft MND

Potential noise and transportation and traffic Project impacts were analyzed in Sections 3.12 and 3.16 of the Draft MND, respectively. The analysis included performing noise and traffic studies (Appendix I and J of the Draft MND) as well as considering the Project's contribution to cumulative impacts with the Landfill Expansion Project, Aerobic Digestion Project and Grayson Repowering Project. These analyses (which included Project vehicle trips on Figueroa Street) demonstrate the Project would have less than significant Project-specific and cumulative noise and traffic impacts.

The City did not select the same sensitive noise receptors for the Biogas Renewable Generation Project as those selected for Scholl Canyon Landfill Expansion Project. The locations selected for collecting ambient noise measurements to determine representative existing noise levels for the Biogas Renewable Generation Project were based on the nearest location of sensitive residential land uses in closest proximity to the Project. These residential land uses would have the greatest potential to be impacted by Project noise and are most appropriate for evaluating potential worst-case operational noise impacts of the Project on surrounding sensitive receptors.

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The Biogas Renewable Generation Project would result in a peak of 23 truck/vehicle trips per day during construction and six vehicle trips per day during operation. The long-term operation vehicle trips are comparable to those that already exist for operation of the landfill gas collection and treatment/conditioning activities and would represent a negligible increase from existing conditions. As a result, Receptor 1 considered in the Scholl Canyon Landfill Expansion Project Draft EIR that is located just north of Highway 134 and approximately 80 feet west of Figueroa Street was not selected for the Biogas Renewable Generation project as it is located further away from the Project facility compared to other receptors selected and because of the limited increase in traffic that would occur as a result of the Project, the Project would not result in a substantial increase in noise levels along Figueroa Street and Receptor 1 evaluated in the Scholl Canyon Landfill Expansion Project Draft EIR.

Ambient noise levels at sensitive receptor R2 which is located south of State Highway 134 were the highest of the six locations measured. In fact, the existing day (65.2 dBA) and night time (64.3 dBA) noise levels at sensitive receptor R2 already exceed the City's presumed noise standard of 45 dBA during nighttime or 55 dBA during daytime. The City's noise ordinance addresses situations where the actual ambient noise level is more than the presumed ambient noise level. In these situations, the ambient noise level used in Project impact analysis cannot be greater than 5 dBA over the presumed ambient noise levels even if actual ambient noise levels are higher<sup>15</sup>. This requirement of the City's noise ordinance provides additional assurance that substantial noise increases in areas already subject to high ambient noise levels are not significantly exacerbated. In the case of sensitive receptor R2, the Project noise impact analysis assumed day and night time ambient noise levels of 60 and 50 dBA.

As shown in Table 3.12-3 of the Draft IS/MND, the nearest residential receptors are more than 2,000 feet from the Project site. Table 3.12-5 of the Draft IS/MND shows the resulting Project operation noise level at each of the six representative sensitive receptors. As shown in Table 3.12-5, Project operation noise ranges from 29.9 dBA to 40.6 dBA at each sensitive receptor. The greatest increase in existing noise levels was predicted to be a 1.5 dBA increase during the night time at sensitive receptor R5, far below the City's allowable increase of 5 dBA in the City noise ordinance used for purposes of the Project's noise impact analysis. City of Glendale's noise ordinance requires equal or more stringent noise limitations than those established by adjacent municipalities with sensitive receptors that could be affected and is therefore appropriate for the Project's conservative noise impact analysis included in the Draft IS/MND.

Actual ambient noise measurements collected at the six representative sensitive noise receptors ranged between 37.1 dBA and 65.2 dBA during the day and between 39.1 dBA and 64.3 dBA during the night time. Despite these wide variations in ambient noise levels, the noise modeling conducted to analyze the Project's potential noise impacts demonstrates as shown in Table 3.12-5 that the Project would not result in a substantial increase in noise levels at any of the sensitive receptors analyzed. The less than significant incremental increase in noise levels

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<sup>15</sup> City of Glendale Municipal Code, Chapter 8.36 NOISE CONTROL, available at: <http://acode.us/codes/glendale/>

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predicted at each sensitive receptor would be representative of all nearby sensitive receptors regardless of variations in ambient noise levels between sensitive receptors.

### Disaster Routes

The Los Angeles County Operational Area Primary Disaster Routes identified for the City of Glendale are State Route 134, State Route 2, and Interstate 5. The Secondary Disaster Routes in the City of Glendale are Verdugo Road/Canada Boulevard, Foothill Boulevard, Colorado Street, and San Fernando Road (Los Angeles County Department of Public Works, 2012)<sup>16</sup>. Nearby Figueroa Street is also designated as a Secondary Disaster Route for the City of Los Angeles. It is important to note that according to Los Angeles County, disaster routes are not evacuation routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area.

The Project site is located approximately ½ mile from State Route 134 (the nearest Primary Disaster Route) and more than ¾ mile from the Figueroa Street (the nearest Secondary Disaster Route). As discussed in Response to Topical Comment No. 8, the Project would not result in a substantial increase or potentially significant risk associated with a fire, explosion, or release of hazardous materials. The Project would therefore have a less than significant impact on Disaster Routes.

### Public Safety Related to an Increase in Truck Traffic

As noted in the Draft IS/MND, the following truck and worker vehicle trips would be associated with the Project:

- five roundtrip truck trips and ten worker vehicle trips daily during the four to five month-demolition phase;
- ten roundtrip truck trips and twelve worker vehicle trips daily during the nine to ten-month site grading and construction period; and
- three roundtrip truck trips and 20 worker vehicle trip daily during the two to three-month system startup phase.

There would be no increase in truck traffic during operation of the Project compared to existing conditions. Up to six worker vehicle trips would occur daily during operation, which is similar to that which occurs under existing facility operations. While there would be an incremental increase in truck traffic during construction of the Project, a peak, short-term addition of the above truck and vehicle trips would not substantially increase risks to public safety.

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<sup>16</sup> Los Angeles County Department of Public Works, 2012, City of Glendale Disaster Route Map, Available: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Glendale.pdf>

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### Illegal Dumping

The Project does not include the hauling of waste materials to the Scholl Canyon Landfill from off-site sources that could result in illegal dumping in adjacent residential areas. Please also refer to Topical Response No. 1.

### **8.1.1.10 Topical Response 10: Public Noticing and Project Location**

#### **Summary of Comments**

Comments received claim that the City did not fulfill its public noticing requirements mandated by the California Environmental Quality Act. Additional comments received requested that the City hold a public meeting for Eagle Rock residents located in the City of Los Angeles as well as requests to extend the public review period of the Draft MND.

Comments received stating there was a complete lack of transparency regarding the Project on the City's Planning Department website. The Project address is listed with a Los Angeles address instead of under the Project name or a recognizable address for the Scholl Canyon Landfill.

#### **Response**

##### **Public Noticing**

The City provided public notice of the Project in accordance with the California Environmental Quality Act. Section 15072 of the CEQA Guidelines specifies the requirements for Notice of Intent to adopt a negative declaration or mitigated negative declaration and are listed below.

- a) *A lead agency shall provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the review period provided under Section 15105.*
- b) *The lead agency shall mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing and shall also give notice of intent to adopt a negative declaration or mitigated negative declaration by at least one of the following procedures to allow the public the review period provided under Section 15105:*
  - 1) *Publication at least one time by the lead agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is*

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*affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.*

- 2) Posting of notice by the lead agency on and off site in the area where the project is to be located.*
- 3) Direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll.*
- c) The alternatives for providing notice specified in subdivision (b) shall not preclude a lead agency from providing additional notice by other means if the agency so desires, nor shall the requirements of this section preclude a lead agency from providing the public notice at the same time and in the same manner as public notice required by any other laws for the project.*
- d) The county clerk of each county within which the proposed project is located shall post such notices in the office of the county clerk within 24 hours of receipt for a period of at least 20 days.*
- e) For a project of statewide, regional, or areawide significance, the lead agency shall also provide notice to transportation planning agencies and public agencies which have transportation facilities within their jurisdictions which could be affected by the project as specified in Section 21092.4(a) of the Public Resources Code. "Transportation facilities" includes: major local arterials and public transit within five miles of the project site and freeways, highways and rail transit service within 10 miles of the project site.*
- f) A notice of intent to adopt a negative declaration or mitigated negative declaration shall specify the following:*
  - 1) A brief description of the proposed project and its location.*
  - 2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.*
  - 3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.*
  - 4) The address or addresses where copies of the proposed negative declaration or mitigated negative declaration including the revisions developed under Section 15070(b) and all documents referenced in the proposed negative declaration or*

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*mitigated negative declaration are available for review. This location or locations shall be readily accessible to the public during the lead agency's normal working hours.*

- 5) *The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.*
- 6) *Other information specifically required by statute or regulation for a particular project or type of project.*

The City submitted a Notice of Completion of the Draft MND to the State Clearinghouse, a Notice of Completion/Notice of Intent to adopt the Draft IS/MND to the Los Angeles County Clerk, and notice to responsible and trustee agencies on August 30, 2017. There were no members of the public that previously requested individual noticing. The City met the noticing requirement specified in subpart a). There were no organizations and individuals who had previously requested notice in writing. Consistent with subpart b) 1), the City noticed the intent to adopt a mitigated negative declaration in the Glendale News on August 30, 2017. Subpart c) does not require additional noticing requirements. Subpart d) refers to Los Angeles County Clerk posting requirements, rather than the City's responsibilities. The Project is not a project of statewide, regional, or areawide significance and the requirements specified in Subpart e) are not applicable to the Project's noticing. The City's noticing included all the elements required by subpart f), with the exception of f)3) which currently remains unknown. The public hearing for considering adoption of the Draft IS/MND will be noticed separately when determined.

The period to provide comments on the Draft MND began on August 31, 2017, and was extended from September 30, 2017, to October 20, 2017, then again to November 9, 2017, in order to provide the public with the fullest opportunity to comment on the Project. This comment period is an extension of 40 days beyond the minimum 20-day public review period for a MND as required by CEQA Guidelines Section 15073 (a).

The California Environmental Quality Act does not require a Lead Agency to conduct public meetings on a Draft IS/MND prior to the public hearing when the Lead Agency considers adopting the IS/MND. As shown above, the City fulfilled the public noticing requirements of the California Environmental Act for a mitigated negative declaration.

Pursuant with Section 15073 of the California Environmental Quality Act, the lead agency shall provide a public review period of no less than 30 days, if submitted to Sate Clearinghouse as the Project's IS/MND was. The City noticed the State Clearinghouse, Los Angeles County Clerk, and responsible and trustee agencies of the 30-day public review period from August 30 to September 30, 2017. The original 30-day public review period was extended and noticed twice,

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resulting in an 82 day long public review period ending on November 20, 2018. The public review period granted was over twice the duration required by the California Environmental Quality Act.

### ***Project Location***

The Project is proposed to be located within the existing boundaries of the Scholl Canyon Landfill on a non-fill portion of the site; it will be located on bedrock.

The Project location is within the site boundary of the Scholl Canyon Landfill (3001 Scholl Canyon Road, Glendale, CA 91206) and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041.

The City alternately identifies projects using street addresses or by name on the City's Planning Department Environmental Review webpage <http://www.glendaleca.gov/environmental>. The Project was identified by its street address on this webpage in a similar manner as other projects. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041.

The Draft MND lists the address as 3001 Scholl Canyon Road, Glendale, CA 91206; additionally, the GWP website <http://glendalebiogasgeneration.com/> states, "The proposed Biogas Renewable Generation Project is located within the boundaries of the existing landfill site at 3001 Scholl Canyon Road, Glendale California, 91206. Regional access to the site is from the Ventura Freeway (State Route 134) at the Figueroa Street exit."

### **8.1.2 Responses to Comments**

#### **L-1 - Responses to Comments from Jack Cheng, South Coast Air Quality Management District (SCAQMD), dated September 15, 2017**

- L1-1 Technical documents related to the air quality (air quality modeling, health risk assessment files, and emission estimates) and greenhouse gas analyses have been provided to SCAQMD in electronic format under separate cover. These include original emission calculation spreadsheets and modeling files.
- L1-2 Native air quality modeling files have been provided to SCAQMD under separate cover.



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**L-2 - Responses to Comments from Amy Minter, Attorney for Glenoaks Canyon Homeowners Association (GOCHA), dated September 26, 2017**

- L2-1 Please refer to Topical Response No. 10.
- L2-2 In the interest of transparency the City has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. Additional information regarding the Project can be found on the Project website at: <http://glendalebiogasgeneration.com/> and on the Scholl Canyon Landfill website home page at: <https://www.schollcanyonlandfill.org/>. Please also refer to Topical Response No. 10.
- L2-3 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072 and in the interest of transparency has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. The City alternately identifies projects using street addresses or by name on the City's Planning Department Environmental Review webpage. The Project was identified by its street address on this webpage in a similar manner as other projects. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. Please also refer to Topical Response No. 10.
- L2-4 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L2-5 Please refer to Topical Response No. 10.
- L2-6 As requested, notifications for future public notices regarding the Project will be distributed to GOCHA by email to [rmarquis@securedfinancialservices.com](mailto:rmarquis@securedfinancialservices.com) as well as by mail to P.O. Box 9949 Glendale, CA 91226.

**L-3 - Responses to Comments from Cynthia Kellman of Chatten-Brown & Carstens, dated September 26, 2017**

- L3-1 Thank you for your comment regarding transmittal of Comment Letter No. L2 from Amy Minter, Attorney for GOCHA, dated September 26, 2017. Please refer to Response to Comment Letter No. L2.

**L-4 - Responses to Comments from Jose Huizar, Council Member, City of Los Angeles 14th District, dated September 27, 2017**

- L4-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.

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- L4-2 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L4-3 Please refer to Topical Response No. 10.
- L4-4 Please refer to Topical Response No. 10.
- L4-5 Please refer to Topical Response No. 10.
- L4-6 Please refer to Topical Response No. 10.

**L-5 - Responses to Comments from Rich Schmittiel, dated September 27, 2017**

- L5-1 This is a general statement about the commenter's life and connection to the City of Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L5-2 Please refer to Topical Response No. 1.
- L5-3 This is a general statement expressing the commenter's support of the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-6 - Responses to Comments from Dianna Watson of the California Department of Transportation (CALTRANS), dated September 28, 2017**

- L6-1 The City concurs that the Project will not result in direct adverse impacts to State transportation facilities as concluded in Section 3.16 of the Draft MND.
- L6-2 In the event the use of oversized vehicles is required during construction of the Project the City will obtain any necessary Caltrans transportation permits.
- L6-3 Stormwater will be managed during construction as described in Section 3.8 of the Draft MND and during operation as described in Sections 3.9 and 3.18. Stormwater will be managed in accordance with all relevant Federal, State, and local regulations and requirements.
- L6-4 The City will contact Severin Martinez and refer to GTS# 07-LA-2017-01106 if there are any questions or concerns regarding the comments made in this letter.

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**L-7 - Responses to Comments from Lisa Karahallos, dated September 28, 2017**

- L7-1        The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-8 - Responses to Comments from Flor Mendez, dated September 29, 2017**

- L8-1        Please refer to Topical Response No. 10.

**L-9 - Responses to Comments from Kim Turner, dated September 29, 2017**

- L9-1        The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-10 - Responses to Comments from Sean Starkey, Field Deputy, Office of Councilmember Jose Huizar, City of Los Angeles 14th District, dated September 29, 2017**

- L10-1       The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L10-2       Please refer to Topical Response No. 10.
- L10-3       Thank you for your comment regarding transmittal of Comment Letter No. L4 from Jose Huizar, Council Member, City of Los Angeles 14th District, dated September 27, 2017. Please refer to Comment Letter No. L4.

**L-11 - Responses to Comments from Harvey Slater, Historic Highland Park Neighborhood Council, dated October 5, 2017**

- L11-1       Please refer to Topical Response No. 3.
- L11-2       The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 3.

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- L11-3 The period to provide comments on the Draft MND began on August 31, 2017, and was extended from September 30, 2017, to October 20, 2017, then again to November 9, 2017, in order to provide the public with the fullest opportunity to comment on the Project. This comment period is an extension of 40 days beyond the minimum 20-day public review period for a MND as required by CEQA Guidelines Section 15073 (a). Please also refer to Topical Response No. 10.
- L11-4 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. Please also refer to Topical Response No. 10.
- L11-5 Please refer to Topical Response No. 6.
- L11-6 Please refer to Section 3.9 of the Draft MND for a discussion of potential hydrology and water quality impacts from the Project.
- L11-7 Please refer to Topical Response No. 9.
- L11-8 Please refer to Topical Response No. 5.
- L11-9 Please refer to Topical Response Nos. 1, 5, and 9.
- L11-10 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L11-11 Please refer to Topical Response No. 9.
- L11-12 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.
- L11-13 Please refer to Topical Response Nos. 7 and 8.

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- L11-14 Please refer to Topical Response No. 3.
- L11-15 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L11-16 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 3.

**L-12 - Responses to Comments from Greg Merideth, made on behalf of the board of The Eagle Rock Association (TERA), dated October 9, 2017**

- L12-1 Thank you for your comment regarding transmittal of the request from The Eagle Rock Association regarding the Project.
- L12-2 Please refer to Topical Response No. 10.
- L12-3 Please refer to Topical Response No. 10.
- L12-4 Please refer to Topical Response No. 10.
- L12-5 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-13 - Responses to Comments from Mark Pestrella and Shari Afshari of the County of Los Angeles Department of Public Works, dated October 10, 2017**

- L13-1 The period to provide comments on the Draft MND began on August 31, 2017, and was extended from September 30, 2017, to October 20, 2017, then again to November 9, 2017, in order to provide the public with the fullest opportunity to comment on the Project. This comment period is an extension of 40 days beyond the minimum 20-day public review period for a MND as required by CEQA Guidelines Section 15073 (a).
- L13-2 The City has complied with all noticing requirements applicable to the Project. The County of Los Angeles Department of Public Works has been notified in

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accordance with the legal requirements governing its notification by the City of the Notice of Intent to Adopt the MND. In accordance therewith, the City published multiple notices of the proposed Mitigated Negative Declaration as follows:

- By delivering 15 copies on August 30, 2017 to the State Clearinghouse
- By delivering two copies to the Los Angeles County Clerk
- Newspaper publication
- By mailing notices, including but not limited to notices addressed to Donald L. Wolfe, Director – Los Angeles County Department of Public Works and Fred M. Rubin Environmental Programs Division – Los Angeles County Department of Public Works

Additionally, on September 29th, the City submitted notice of the extension of the comment period deadline to October 20, 2017 by delivering the notice of extension to the State Clearinghouse, Los Angeles County Clerk, and mailing notices in the same manner as indicated above.

Therefore, the City has indeed provided adequate notice of its proposed MND and the extension of the comment period from September 30, 2017 to October 20, 2017, with the Los Angeles County Department of Public Works management receiving at least two mailed notices. Additionally, the City also granted County of Los Angeles Department of Public Works' request, in its correspondence dated October 10, 2017, for an extension of time of 30 days, for the comment period on the proposed MND. Please also refer to Topical Response No. 10.

L13-3 Ms. Shari Afshari will be contacted with any questions or concerns regarding the comments made in this letter.

**L-14 - Responses to Comments from Francis F Coburn, dated October 15, 2017**

L14-1 The comments have been included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

L14-2 The existing pipeline that takes Scholl Canyon Landfill Gas (methane gas) to Grayson can be used. Currently at Grayson, landfill gas can be combusted only in the boilers of Units 3, 4, and 5. Landfill gas combusted at Grayson is costly and produces more air emission than the new units constructed as part of the Project that would benefit from new technology and state of the art air clean up systems. Furthermore, of the units that currently burn landfill gas at Grayson, Unit 3 is presently out of service and Units 4 and 5 have limited remaining useful life.

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SCAQMD is currently promulgation Rule 1135 that will require all the existing units at Grayson to be retrofitted with current Best Available Control Technology to comply with current air emission standards which would be extremely costly if even technologically possible for such old units. The City has determined that siting a Biogas Renewable Generation Project at the Scholl Canyon Landfill is more efficient and cost effective than continuing to utilize a pipeline to transport landfill gas to the Grayson Power Plant. Please also refer to Topical Response No. 2.

The glut of power available on the market is not relevant to the use of the existing landfill gas pipeline between Grayson and Scholl Canyon. The existing boilers that burn the landfill gas are old, inefficient and scheduled to be demolished. The new replaced equipment, due to technical reasons, cannot burn landfill gas and therefore the pipeline is no longer needed.

- L14-3 Before Toyon landfill was closed, a 9 MW power plant, similar to the proposed Biogas Renewable Generation Project, was constructed to burn the produced landfill gas. Since the closure of Toyon landfill in the mid-1980s, the production of landfill gas has diminished where only sufficient landfill gas is available to produce 1 MW of electricity. The 1 MW power plant will cost \$3.29 million.

Landfill gas is a free renewable source of energy and since all the landfill gas produced is required to be incinerated, it makes economic sense to utilize all the free energy to produce electricity rather than flare the landfill gas.

- L14-4 Please refer to Topical Response Nos. 2 and 3.

- L14-5 The Commenter cites a Los Angeles Times Article that opinions that California has a glut of electricity. The availability of the glut of electricity in California is irrelevant to the residents of Glendale because sufficient transmission capacity is not available to bring this excess electricity into the City of Glendale. Therefore, the City has to generate as much power internally as possible and the Biogas Renewable Generation Project is located within the City limits. The assertions in this article reflect a broad survey of state projects that do not reflect on local power needs or on local constraints to obtain sufficient reliable power. The purpose of the Project is set forth in the MND and in Topical Response No. 2.

As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations. Currently, the landfill gas produced at the landfill is transported via pipeline to the Grayson Power Plant and used to supplement natural gas to produce power that is transmitted to the



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electric grid. The City of Glendale is proposing to continue to utilize the methane-rich renewable landfill gas as fuel to generate electricity at the Scholl Canyon Landfill instead of transferring it off-site to the Grayson Power Plant, but the City is not required to do so. The landfill gas must be combusted on site via permitted flaring or can be used in a beneficial manner, such as in the Project. The Biogas Renewable Generation Project has a number of benefits to the environment, the City of Glendale, and its citizens including:

- Provide beneficial use of naturally occurring landfill gas as fuel for power generating equipment;
- Offset the cost to procure power produced by other means by utilizing a free source of landfill gas to produce power;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio; and
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.

L14-6      The City has determined that siting a Biogas Renewable Generation Project at the Scholl Canyon Landfill is more efficient and cost effective than continuing to utilize a pipeline to transport landfill gas to the Grayson Power Plant. Please also refer to Topical Response No. 2 and Response to Comment No. L14-5.

L14-7      The landfill gas power generating facilities proposed for the Project have been optimally designed based on the volume of expected landfill gas produced by the landfill over the economic life of the power production facilities. Please also refer to Topical Response No. 2.

Please refer to Response to Comment No. L14-3.

L14-8      Please refer to Topical Response Nos. 2, 3, and 4.

L14-9      The landfill gas power generating facilities proposed for the Project have been optimally designed based on the volume of expected landfill gas produced by the landfill over the economic life of the power production facilities.

L14-10     Please refer to Topical Response Nos. 2 and 3.

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**L-15 - Responses to Comments from Joan Morris, dated October 15, 2017**

- L15-1 Please refer to Topical Response No. 5.
- L15-2 Please refer to Topical Response No. 5.
- L15-3 Please refer to Topical Response No. 5.
- L15-4 Please refer to Topical Response Nos. 3 and 4.
- L15-5 Please refer to Topical Response No. 5.
- L15-6 Please refer to Topical Response No. 5.
- L15-7 Please refer to Topical Response No. 5.
- L15-8 Please refer to Topical Response Nos. 1 and 5.
- L15-9 Please refer to Topical Response Nos. 1, 2, 3, and 4.
- L15-10 Please refer to Topical Response No. 5.
- L15-11 Please refer to Topical Response No. 5.
- L15-12 While the landfill is visible from Glenoaks Canyon the Project is not visible from Glenoaks Canyon. Please also refer to Topical Response No. 5.
- L15-13 Please refer to Topical Response Nos. 1, 2, and 3.

**L-16 - Responses to Comments from MeHee Hyun, dated October 16, 2017**

- L16-1 Please refer to Topical Response No. 3.
- L16-2 Please refer to Topical Response No. 8.

**L-17 - Responses to Comments from Susan Phillips, dated October 16, 2017**

- L17-1 Please also refer to Topical Response Nos. 2, 3, and 4.
- L17-2 Please refer to Topical Response Nos. 6 and 9, and Section 3.12 (Noise) and Section 3.3 (Air Quality) of the Draft MND. The Project construction does not include any mining activity, blasting or pile driving. Please also refer to Draft MND Section 2 (Project Description).
- L17-3 Please refer to Response to Comment No. L17-2.

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- L17-4 Please refer to Topical Response No. 3.
- L17-5 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072 and in the interest of transparency has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. Additional information regarding the Project can be found on the Project website at: <http://glendalebiogasgeneration.com/> and on the Scholl Canyon Landfill website home page at: <https://www.schollcanyonlandfill.org/>. Please also refer to Topical Response No. 10.

**L-18 - Responses to Comments from Communities United, dated October 17, 2017**

- L18-1 The comment is a general statement about the commenter's opinion of the Scholl Canyon Landfill. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L18-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L18-3 Please refer to Topical Response No. 8.
- L18-4 The City agrees that flaring methane is better for the environment than releasing it. The presence of a power generation facility at the Scholl Canyon Landfill would not be used to justify prolonging operation of the landfill. Please also refer to Topical Response No. 1.
- L18-5 Please refer to Topical Response No. 10.
- L18-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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**L-19 - Responses to Comments from David Choi, dated October 17, 2017**

- L19-1 Please refer to Topical Response No. 6.
- L19-2 Please refer to Topical Response No. 6.
- L19-3 Please refer to Topical Response No. 6.
- L19-4 Please refer to Topical Response No. 6.
- L19-5 The commenter expresses concern that the background pollutant concentrations used for the air modeling study were obtained from an ambient air quality monitoring station located four miles away in Pasadena and six miles away in Los Angeles on North Main Street.
- As outlined in 40 CRF 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the Project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCQAMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B, and PSD monitoring guidance, and the data have been collected within the preceding three years. Use of these data are therefore appropriate for the Project analysis. Please also refer to Topical Response No. 6.
- L19-6 The commenter indicates that there is no mention of toxic air contaminants in the Draft MND. The toxic air contaminants emission inventory and health risk assessment are discussed on page 3.3.44 through 3.3.48. As discussed in the Draft MND, the cancer risk, chronic hazard index, and acute hazard index of the Project are below the health risk significance thresholds that are suggested by SCAQMD and the Office of Environmental Health Hazard Assessment. Please also refer to Topical Response No. 6.
- L19-7 Please refer to Topical Response Nos. 1, 2, 3, and 4.
- L19-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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**L-20 - Responses to Comments from Marie Freeman, dated October 17, 2017**

- L20-1 As requested, you will be included on the distribution list for future public notices regarding the Project.

**L-21 - Responses to Comments from Marla Nelson, dated October 17, 2017**

- L21-1 As requested, you will be included on the distribution list for future public notices regarding the Project.

**L-22 - Responses to Comments from Nancy Robbins, dated October 17, 2017**

- 22-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 8.
- 22-2 Please refer to Topical Response No. 8.
- 22-3 Please refer to Draft MND Section 3.6 (Geology and Soils), Section 3.8 (Hazards and Hazardous Materials), and Topical Response No. 7.
- 22-4 Please refer to Topical Response No. 6.
- 22-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-23 - Responses to Comments from Lijin Sun, South Coast Air Quality Management District (SCAQMD), dated October 17, 2017**

- L23-1 The City also appreciates comments from SCAQMD.
- L23-2 The City does not concur with the SCAQMD Staff's summary of the Project Description because the existing landfill gas collection system will not be demolished; it will continue to be used to collect the landfill gas for the Project.
- L23-3 The City concurs with the SCAQMD Staff's summary of the Air Quality Analysis. Please also refer to Topical Response No. 6.

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- L23-4 In response to SCAQMD Staff's comments regarding Air Quality Cumulative Impacts Analysis, please refer to Topical Response No. 6.
- L23-5 In response to SCAQMD Staff's comments regarding Energy Input Rating, the manufacturer's specified maximum energy input of 23.9 MMBtu/hr is based on the lower heating value; the manufacturer provides an energy input rating of 26.34 MMBtu/hr based on the higher heating value. This heat input rating is provided by the manufacturer on the proposal form that is specific to the Project.
- The greenhouse gas emissions will be revised based on the heat input rating of 26.4 MMBtu/hr per engine. The heat input for four engines would be 105.6 MMBtu/hr, which result in a total greenhouse gas emission of 48,616 MT/year.
- L23-6 In response to SCAQMD Staff's comments regarding Compliance with SCAQMD Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing, the existing landfill gas pipeline would be abandoned in place. The line would be purged with an inert gas such as nitrogen to ensure there are no VOC gaseous materials left in the pipe. Then, the line will be capped with cement plugs or similar items on each end.
- L23-7 In response to SCAQMD Staff's comments regarding Compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, the asbestos survey will be amended should demolition plans change.
- L23-8 In response to SCAQMD Staff's comments regarding Compliance with SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills, because the proposed landfill combustion system, which consists of the engines, is expected to meet the Rule 1150.1 requirements, 1150.1 Alternative Compliance Plan is not required to be submitted. Source tests will be conducted to demonstrate the Rule 1150.1 requirements paragraph (d)(1)(C)(i) and (d)(1)(C)(iv)(I). Additionally, each of the proposed engines will also be equipped with monitoring and recording devices (temperature and gas flow) to demonstrate compliance with paragraph (e)(7)(A).
- L23-9 In response to SCAQMD Staff's comments regarding Compliance with California Code of Regulation Title 13, Division 3, Chapter 9, Article 5 – Portable Engine and Equipment Registration, any equipment brought onsite will be registered with CARB under PERP. If such equipment meets any conditions of the PERP regulation or the Stationary Engine ATCM that require the issuance of a local operating permit, GWP will then submit appropriate applications to SCAQMD. GWP or its contractors will notify SCAQMD of any portable engines that are brought on-site as required in state and local regulations. Please also refer to Topical Response Nos. 4 and 6.

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L23-10 SCAQMD is correct that the City intends to utilize the Final MND for CEQA compliance related to any permits requested from SCAQMD for the Project and will ensure that accurate information pertaining to facilities requiring a permit will be included in the Final MND.

SCAQMD has been added to the Final MND as a Responsible Agency per your request.

L23-11 The City appreciates SCAQMD's offer of assistance to answer questions regarding your CEQA comments and will contact you in the event any clarifications of your comments are needed.

**L-24 - Responses to Comments from Brian Bard, dated October 18, 2017**

L24-1 Thank you for transmittal of comment letter L24. The comments have been included in the Final MND.

L24-2 Please refer to Topical Response No. 6.

L24-3 Please refer to Topical Response No. 6.

L24-4 Please refer to Topical Response No. 6.

L24-5 Please refer to Topical Response No. 8.

L24-6 Please refer to Topical Response Nos. 1, 8, and 9.

L24-7 Please refer to Topical Response No. 7.

L24-8 Please refer to Topical Response No. 4.

L24-9 The comment is a general statement about the commenter's opinion of the Scholl Canyon Landfill. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-25 - Responses to Comments from Celine Abrahams, dated October 18, 2017**

L25-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.



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- L25-2 Please refer to Topical Response No. 6.
- L25-3 Please refer to Topical Response No. 6.
- L25-4 Please refer to Topical Response No. 8.
- L25-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L25-6 Please refer to Topical Response No. 7.
- L25-7 Please refer to Topical Response No. 4.
- L25-8 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072 and in the interest of transparency has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. The City alternately identifies projects using street addresses or by name on the City's Planning Department Environmental Review webpage. The Project was identified by its street address on this webpage in a similar manner as other projects. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. Please also refer to Topical Response No. 10.
- L25-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-26 - Responses to Comments from Rick Marquis of Glenoaks Canyon Homeowners Association (GOCHA), dated October 18, 2017**

- L26-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L26-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L26-3 Please refer to Topical Response No. 4.
- L26-4 Please refer to Topical Response No. 3.

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L26-5 Please refer to Topical Response No. 3.

L26-6 As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations. Currently, the landfill gas produced at the landfill is transported via pipeline to the Grayson Power Plant and used to supplement natural gas to produce power that is transmitted to the electric grid. The City of Glendale is proposing to continue to utilize the methane-rich renewable landfill gas as fuel to generate electricity at the Scholl Canyon Landfill instead of transferring it off-site to the Grayson Power Plant, but the City is not required to do so. The landfill gas must be combusted on site via permitted flaring or can be used in a beneficial manner, such as in the Project. The Biogas Renewable Generation Project has a number of benefits to the environment, the City of Glendale, and its citizens including:

- Provide beneficial use of naturally occurring landfill gas as fuel for power generating equipment;
- Offset the cost to procure power produced by other means by utilizing a free source of landfill gas to produce power;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio; and
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.

Please also refer to Topical Response Nos. 1, 3, and 4.

L26-7 Please refer to Topical Response Nos. 1 and 6.

L26-8 As stated in the Draft MND, the City is evaluating approaches to comply with California Assembly Bill 1594 which precludes accounting of green waste used as alternative daily cover in the 50 percent waste diversion by recycling requirements of State law. Use of green waste digesters which would produce methane for use as fuel in vehicles or for power production is being evaluated to meet the requirements of this law by 2020. The location of digesters, if used, has not been determined. Please also refer to the Draft MND Section 3.19 (Mandatory Findings of Significance) and Topical Response No. 4.

L26-9 Please refer to Topical Response No. 2.

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- L26-10 Please refer Draft MND Table 1.5-1 Agency Permits and Environmental Review Requirements. This table summarizes the agencies that will have permitting and environmental review oversight of the Project beyond Glendale's jurisdictional limits. These include California Air Resources Board (review the Draft MND), SCAQMD (Responsible Agency), Los Angeles Department of Public Health (Responsible Agency), Los Angeles Regional Water Quality Control Board (stormwater pollution and prevention), and the Los Angeles County Department of Public Works (review of the Draft MND). These agencies represent the surrounding area and their review is incorporated into the Final MND. Further, the Final MND is required to analyze impacts of the Project on the environment regardless of jurisdictional limits. The Final MND has adequately evaluated Project impacts as required by CEQA. Please also refer to Topical Response No. 1.
- L26-11 Please refer to Topical Response Nos. 4 and 6.
- L26-12 Please refer to Topical Response No. 6.
- L26-13 Please refer to Topical Response Nos. 1, 3, and 6.
- L26-14 Please refer to Topical Response No. 5.
- L26-15 Please refer to Topical Response No. 5.
- L26-16 Please refer to Topical Response No. 5.
- L26-17 Please refer to Topical Response No. 7, specifically, the Project is proposed to be located within the existing boundaries of the Scholl Canyon landfill on a non-fill portion of the site; it will be located on bedrock. There are hundreds of biogas facilities located adjacent to landfills that burn landfill gas in California and across the United States. For example, there are biogas facilities that burn landfill gas located at Toyon Canyon, Sylmar, Calabasas, Perris, Halfmoon Bay, Puente Hills, and Brea, California to name a few. There are no Project or cumulative impacts that are not mitigated to a level of less than significance.
- L26-18 There are no Project or cumulative impacts that are not mitigated to a level of less than significance.
- L26-19 Please refer to Topical Response No. 3.
- L26-20 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the

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- L26-21 The Project would be located at Scholl Canyon Landfill site, an existing Class III nonhazardous landfill facility that accepts municipal solid waste and is not a generator of, or repository for, hazardous wastes. Please also refer to Section 3.8 (Hazards and Hazardous Materials) of the Draft MND and Topical Response No. 8.
- L26-22 The Project would be located at Scholl Canyon Landfill, an existing Class III nonhazardous landfill facility that accepts municipal solid waste and is not a generator of, or repository for, hazardous wastes. Please also refer to Section 3.8 (Hazards and Hazardous Materials) of the Draft MND and Topical Response No. 8.
- L26-23 Please refer to Topical Response Nos. 7 and 8.
- L26-24 Please refer to Section 3.8 (Hazards and Hazardous Materials) of the Draft MND and Topical Response No. 8.
- L26-25 Please refer to Section 3.8 (Hazards and Hazardous Materials) of the Draft MND and Topical Response No. 8.
- L26-26 Please refer to Topical Response No. 8.
- L26-27 Please refer to Topical Response No. 9.
- L26-28 Please refer to Topical Response Nos. 3 and 4.
- L26-29 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-27 - Responses to Comments from Marla Nelson, dated October 18, 2017**

- L27-1 Please refer to Topical Response No. 6.
- L27-2 Please refer to Topical Response No. 6.
- L27-3 Please refer to Topical Response No. 6.
- L27-4 Please refer to Topical Response No. 8.
- L27-5 Please refer to Topical Response Nos. 1, 8, and 9.

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L27-6 Please refer to Topical Response No. 7.

L27-7 Please refer to Topical Response No. 4.

**L-28 - Responses to Comments from Martins Aiyetiwa, County of Los Angeles Department of Public Works, dated October 18, 2017**

L28-1 Thank you for your comment regarding transmittal of comment letter L13. The period to provide comments on the Draft MND was extended to November 9, 2017. Please also refer to response to Comment Letter No. L13 and Topical Response No. 10.

**L-29 - Responses to Comments from Owen and Robin Lewis, dated October 18, 2017**

L29-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

L29-2 The Notice was provided to invite the public to provide comments on the environmental document. Please also refer to Topical Response No. 3.

L29-3 Please refer to Topical Response No. 6 and Section 3.3 (Air Quality) of the Draft MND.

L29-4 Please refer to Topical Response No. 9 and Section 3.12 (Noise) of the Draft MND.

L29-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No 6.

L29-6 Please refer to Topical Response Nos. 4 and 6.

L29-7 Please refer to Topical Response Nos. 1, 2, 3, and 4.

L29-8 An MND does not mandate evaluation of Project alternatives. The Project has independent utility from the Grayson Repowering Project and Scholl Canyon Landfill. Please refer to Topical Response Nos. 1 and 3. The City has determined that siting a Biogas Renewable Generation Project at the Scholl Canyon Landfill is more efficient and cost effective than continuing to utilize a pipeline to transport

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landfill gas to the Grayson Power Plant. Please also refer to Topical Response No. 2.

- L29-9 -17 Comments L29-9 through L29-17 contain the commenter's opinion about the site, Project and costs associated with the Project. Nowhere does the Draft MND state that the existing pipeline is deficient. The potential environmental impacts of the project were evaluated pursuant to CEQA and that analysis demonstrates that all potential environmental impacts would be no impact, a less than significant impact, or less than significant impact with mitigation. CEQA does not require the Project to incorporate all suggested alternatives or suggested mitigation measures.

**L-30 - Responses to Comments from Sue Flocco, dated October 18, 2017**

- L30-1 Please refer to Topical Response No. 6.
- L30-2 Please refer to Topical Response No. 6.
- L30-3 Please refer to Topical Response No. 6.
- L30-4 Please refer to Topical Response No. 8.
- L30-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L30-6 Please refer to Topical Response No. 7.
- L30-7 Please refer to Topical Response No. 4.

**L-31 - Responses to Comments from Clarence A. Hall, dated October 19, 2017**

- L31-1 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 7.
- L31-2 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

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- L31-3 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 7.
- L31-4 As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the California Building Code and the Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facility structures. The Draft MND concluded that potential impacts related to rupture of a known earthquake fault or strong seismic ground-shaking are considered less than significant. Please also refer to Topical Response No. 7.
- L31-5 The Draft MND is specific to the design, construction, and operation of the Biogas Renewable Generation Project. The geotechnical study prepared for the Project relates directly to the Project which will be located on a non-fill portion of the existing Scholl Canyon Landfill with underlying soil conditions consisting mainly of dense to very dense silty sands over slightly weathered, hard bedrock. As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the California Building Code, ASCE 7, and the Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facility structures. The Draft MND concluded that potential impacts at the Project site related to rupture of a known earthquake fault or strong seismic ground-shaking are considered less than significant. Please also refer to Topical Response No. 7.
- L31-6 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND and the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos 1 and 8.
- L31-7 The Project location is within the site boundary of the Scholl Canyon Landfill and is located northerly of the entrance. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. However, the Project site is located approximately 0.4 miles northeast of California Highway 134. The first sentence on the last paragraph on page 3.6.1 of the Draft MND has been corrected to read "California Highway 134 is located approximately 0.25 miles southwest of the scales and entry/exit gate to the site on Scholl Canyon Road..."



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Other comments are informational in nature and therefore do not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 7.

L31-8 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND and the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. Other comments are informational in nature. . The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 1 and 7.

L31-9 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. Other comments are informational in nature. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 7.

L31-10 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND and the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. Other comments are informational in nature. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Section 3.9 of the Draft MND for a discussion of potential hydrology and water quality impacts from the Project. Please refer to also Topical Response No 1.

L31-11 As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the California Building Code and the Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facility structures. The Draft MND concluded that potential impacts related to rupture of a known earthquake fault or strong seismic ground-shaking are considered less than significant. Please also refer to Topical Response No. 7.

L31-12 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance

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with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

- L31-13 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND and the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. . The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 7.
- L31-14 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND and the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. Other comments are informational in nature. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1 and 8.
- L31-15 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L31-16 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 3.9 of the Draft MND for a discussion of potential hydrology and water quality impacts from the Project. Please refer to also Topical Response Nos 1 and 7.
- L31-17 The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.
- L31-18 There may be as yet undiscovered faults that are not and were not mapped in 1952 or in 1989. Nonetheless, the Project is being constructed to comply with California Building Code, ASCE 7, and Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facilities and structures. The current building and safety code standards that address seismic risk are far

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superior than in 1952, and the MND thoroughly analyzes seismic risk based on the most current data in light of the CEQA threshold. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.

- L31-19 The commenter states an opinion about geologic mapping generally of the area of Scholl Canyon. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.
- L31-20 Please refer to Topical Response No. 7.
- L31-21 Please refer to Topical Response No. 7.
- L31-22 As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the California Building Code, ASCE 7, and the Glendale Building and Safety Code 2016 which considers the risk of seismic events impacting facility structures. The Draft MND concluded that potential impacts at the Project site related to rupture of a known earthquake fault or strong seismic ground-shaking are considered less than significant. Please also refer to Topical Response No. 7.
- L31-23 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.

**L-32 - Responses to Comments from Dennis Malone, dated October 19, 2017**

- L32-1 Please refer to Topical Response No. 6.
- L32-2 Please refer to Topical Response No. 6.
- L32-3 Please refer to Topical Response No. 6.
- L32-4 Please refer to Topical Response No. 8.
- L32-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L32-6 Please refer to Topical Response No. 7.
- L32-7 Please refer to Topical Response No. 4.

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**L-33 - Responses to Comments from Elizabeth Ferrari, dated October 19, 2017**

- L33-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L33-2      Please refer to Topical Response No. 6.
- L33-3      Please refer to Topical Response No. 6.
- L33-4      Please refer to Topical Response No. 6.
- L33-5      Please refer to Topical Response No. 8.
- L33-6      Please refer to Topical Response Nos. 1, 8, and 9.
- L33-7      Please refer to Topical Response No. 7.
- L33-8      Please refer to Topical Response No. 4.
- L33-9      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-34 - Responses to Comments from Gary Syssock, dated October 19, 2017**

- L34-1      Please refer to Topical Response No. 6.
- L34-2      Please refer to Topical Response No. 6.
- L34-3      Please refer to Topical Response No. 6.
- L34-4      Please refer to Topical Response No. 8.
- L34-5      Please refer to Topical Response Nos. 1, 8, and 9.
- L34-6      Please refer to Topical Response No. 7.
- L34-7      Please refer to Topical Response No. 4.

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**L-35 - Responses to Comments from Gerry Rankin, dated October 19, 2017**

- L35-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072 and in the interest of transparency has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. The City alternately identifies projects using street addresses or by name on the City's Planning Department Environmental Review webpage. The Project was identified by its street address on this webpage in a similar manner as other projects. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. Please also refer to Topical Response No. 10.
- L35-2 The City of Glendale apologizes for any inconvenience. It appears that the gentleman to whom you placed your inquiry was misinformed. The Draft MND for the Biogas Renewable Generation Project was available for public review from August 30, 2017 through November 9, 2017, and continues to remain available, on the City of Glendale Community Development's website at: <http://glendalebiogasgeneration.com/>, and at the Glendale Central Library located at 222 E. Harvard Street, Glendale California 90215. Copies of the Draft MND are also available at the Community Development Department of the City of Glendale, 633 East Broadway, Room 103, Glendale, California 91026-4386. Please refer to Response to Comment No. L35-1. Please refer to also Topical Response No. 10.
- L35-3 The information provided to the commenter from the gentleman that kindly provided a general description was essentially correct except that a gas line owned by the City would not be extended to assist in the purifying process. As described in the Draft MND, the Project would connect to the existing Sanitation District landfill gas collection system.
- L35-4 The information provided to the commenter was essentially correct; however, it should be noted that the proposed anaerobic digester project is not a part of the Biogas Renewable Generation Project, and is not needed for the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L35-5 The commenter asks a series of questions concerning how the Biogas Renewable Generation Project will be constructed, and whether it would be expanded in relation to the Scholl Canyon Landfill Project. The comment suggests that the Biogas Renewable Generation Project is the beginning of more projects at Scholl Canyon. The Biogas Renewable Generation Project does not include any future expansion and is separate from any plans to expand the Scholl Canyon Landfill. Please also refer to Topical Response No. 1.

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- L35-6 The Scholl Canyon Landfill gas pipeline is currently permitted and meets regulatory requirements. The pipeline and its proposed decommissioning is analyzed as part of the Biogas Renewable Generation Project. Currently at Grayson, landfill gas can be combusted only in the boilers of Units 3, 4, and 5. Landfill gas combusted at Grayson is costly and produces more air emission than the new units constructed as part of the Project that would benefit from new technology and state of the art air clean up systems. Furthermore, of the units that currently burn landfill gas at Grayson, Unit 3 is presently out of service and Units 4 and 5 have limited remaining useful life. SCAQMD is currently promulgating Rule 1135 that will require all the existing units at Grayson to be retrofitted with current Best Available Control Technology to comply with current air emission standards which would be extremely costly if even technologically possible for such old units. The City has determined that siting a Biogas Renewable Generation Project at the Scholl Canyon Landfill is more efficient and cost effective than continuing to utilize a pipeline to transport landfill gas to the Grayson Power Plant. Also, please refer to Response to Comment Letter No. L14 and Topical Response No. 2
- L35-7 The City provided public notice of the Draft EIR in accordance with CEQA requirements. The DRAFT Environmental Impact Report, Grayson Repowering Project prepared for City of Glendale Water and Power by Stantec Consulting Services Inc., is available in hard copy at the Glendale Central Library Glendale History Room Reference (333.7932 DRA). Please refer to the following link: <http://www.glendaleca.gov/home/showdocument?id=38536>.
- L35-8 The City of Glendale apologizes for any inconvenience, and assures you that a hard copy of the Draft MND for the Biogas Renewable Generation Project was placed at the Central Library. Please refer to Response to Comment No. L28-7 above. Please refer to Response to Comment No. L35-1.
- L35-9 The commenter states an opinion that three other projects are tied to the Biogas Renewable Generation Project at Scholl Canyon. The Biogas Renewable Generation Project has independent utility from Scholl Canyon Landfill, Grayson Repowering Project and from a possible future anaerobic digestion project. Please Refer to Topical Response No. 1 and 2. The MND considered the Scholl Canyon Landfill Expansion Project, and the Green Waste Digester Project with the Grayson Repowering Project in Section 3.19 of the Draft MND. Please refer to also Response to Comment No. L35-2 above.
- L35-10 The Biogas Renewable Generation Project and the Grayson Power Plant Repowering Project are separate and independent projects that are being evaluated through separate CEQA processes. Either project could proceed independently of one another. The only common physical component is the

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existing landfill gas pipeline which will be abandoned in place as part of the Project. Cumulative impacts that could result from the Project in combination with past, current, or probably future projects are discussed in the Draft MND Section 3.19. The Grayson Power Plant Repowering Project is one of the projects in combination with the Project that is considered in the cumulative impacts assessment. Please also refer to Topical Response No. 2.

- L35-11 The City has not determined whether to proceed with a Green Waste Digester Project at Scholl Canyon Landfill. If it proceeds, it would be evaluated as a separate and independent project through a separate CEQA process. Cumulative impacts that could result from the Project in combination with past, current, or probably future projects are discussed in the Draft MND Section 3.19 and Topical Response No. 4.

The City has an exclusive negotiating agreement with a private entity, Waste Resources, Inc., a California corporation, OWS, Inc, an Ohio corporation, and SCORE, LLC, a special purpose joint venture entity (collectively, the "Developers"), is in the process of determining the feasibility of developing an integrated resource recovery and energy conservation facility (the anaerobic digestion project). After the Developers complete their feasibility study, the City will then have the opportunity to evaluate and decide whether it is in the City's interest to pursue such a project. Until a potential anaerobic digestion project is evaluated as potentially feasible it is premature to assume such a project would move forward, and if it does it would need to undergo separate review under CEQA.

- L35-12 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1, 4, and 9.

- L35-13 Please refer to Response to Comment No. L35-12.

- L35-14 Potential aesthetics impacts are discussed in Section 3.1 of the Draft MND. The analysis concluded that no significant aesthetics impacts would occur from the Project. Please also refer to Topical Response No. 5.

- L35-15 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the



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decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1, 2, 3, and 4.

L35-16 As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations. Currently, the landfill gas produced at the landfill is transported via pipeline to the Grayson Power Plant and used to supplement natural gas to produce power that is transmitted to the electric grid. The City of Glendale is proposing to continue to utilize the methane-rich renewable landfill gas as fuel to generate electricity at the Scholl Canyon Landfill instead of transferring it off-site to the Grayson Power Plant, but the City is not required to do so. The landfill gas must be combusted on site via permitted flaring or can be used in a beneficial manner, such as in the Project. The Biogas Renewable Generation Project has a number of benefits to the environment, the City of Glendale, and its citizens including:

- Provide beneficial use of naturally occurring landfill gas as fuel for power generating equipment;
- Offset the cost to procure power produced by other means by utilizing a free source of landfill gas to produce power;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio; and
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.

L35-17 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Draft MND Section 3.19, and Topical Response No. 3.

**L-36 - Responses to Comments from Helen Mallory, dated October 19, 2017**

L36-1 Please refer to Topical Response No. 6.

L36-2 Air quality assessment performed in Section 3.3 of the Draft MND for construction and operation of the Project concluded that emissions in combination with ambient air quality would not exceed thresholds of significance based on California Ambient Air Quality Standards, National Ambient Air Quality Standards,

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and South Coast Air Quality Management District allowable pollutant increases. Please also refer to Topical Response No. 6.

- L36-3 The commenter expresses concern that the background pollutant concentrations used for the air modeling study were obtained from an ambient air quality monitoring station located four miles away in Pasadena and six miles away in Los Angeles on North Main Street.

As outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCQAMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B, and PSD monitoring guidance, and the data have been collected within the preceding 3 years. Use of these data are therefore appropriate for the Project analysis. Please refer to Topical Response No. 6.

- L36-4 Please refer to Topical Response No. 8.

- L36-5 Please refer to Topical Response Nos. 8, and 9.

- L36-6 Please refer to Topical Response No. 7.

- L36-7 The commenter states that the MND relied on 2008 seismic maps instead of the more recent 2014 maps. As stated in the Draft MND, Project facilities will be designed and constructed in accordance with the applicable California Building Code, ASCE 7, and the Glendale Building and Safety Code which considers the risk of seismic events impacting facility structures. All structures will be designed in accordance with the current edition of the California Building Code and Glendale Building and Safety Code that is in effect at the time the facility is designed. Please also refer to Topical Response No. 7.

- L36-8 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.

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- L36-9      The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L36-10     Please refer to Topical Response No. 4.
- L36-11     The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L36-12     Please also refer to Topical Response Nos. 1 and 3.
- L36-13     The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L36-14     The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L36-15     The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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**L-37 - Responses to Comments from Linda Pillsbury, dated October 19, 2017**

- L37-1 Thank you for your comment regarding transmittal of Comment Letter No. L37.
- L37-2 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that during construction and operation of the Project no significant air quality impacts would occur. Please also refer to Topical Response No. 6.
- L37-3 Please refer to Section 3.8 of the Draft MND for a discussion of potential hazardous materials impacts from the Project. The analysis concluded that during construction and operation of the Project no significant hazardous materials impacts would occur. Please also refer to Topical Response No. 8.
- L37-4 Please refer to Topical Response No. 4.
- L37-5 Please refer to Topical Response Nos. 1, 2, 3, 4 and 10.
- L37-6 Please refer Response to Comment No. L37-5.
- L37-7 Please refer to Topical Response Nos. 1, 2, 3, and 4.
- L37-8 The landfill is the source of methane emissions. The Project incinerates methane generated by the landfill; methane is a potent GHG with a significantly higher global warming potential than emissions from combustion. Please refer to Topical Response No. 1 and 3.
- L37-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.
- L37-10 Please refer to Topical Response Nos. 1, 2, 3, 4 and 10.

**L-38 - Responses to Comments from Liz Amsden, dated October 19, 2017**

- L38-1 Please refer to Topical Response No. 3.
- L38-2 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 3.

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L38-3 Please refer to Topical Response No. 10.

L38-4 Please refer to Topical Response No. 10.

The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041.

L38-5 Please refer to Topical Response No. 6.

L38-6 Please refer to Section 3.9 of the Draft MND for a discussion of potential hydrology and water quality impacts from the Project.

L38-7 Please refer to Topical Response No. 9.

L38-8 Please refer to Topical Response No. 5.

L38-9 Please refer to Topical Response Nos. 1, 5, and 9.

L38-10 Please refer to Topical Response Nos. 1 and 9.

L38-11 Draft MND Section 3.16, which demonstrates that the Project would result in less than significant traffic and transportation impacts. Please also refer to Topical Response No. 1 and 9.

L38-12 Please refer to Topical Response No. 1.

L38-13 Please refer to Topical Response Nos. 7 and 8.

L38-14 Please refer to Topical Response Nos. 1 and 3.

L38-15 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

L38-16 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 3.

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**L-39 - Responses to Comments from Marie Freeman, dated October 19, 2017**

- L39-1 Please refer to Topical Response No. 3.
- L39-2 The commenter makes a conclusory statement that there is sufficient evidence to support a fair argument that the mitigation measures may not achieve the goal of reducing impacts [of the Project] below a level of significance. However, the commenter does not provide any evidence to support this statement. The City of Glendale disagrees with the commenter's statement. Please refer to Topical Response No. 3.
- L39-3 Please refer to Topical Response Nos. 1, 2 and 4.
- L39-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L39-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L39-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L39-7 The evaluation of environmental factors in the Draft MND considered the area surrounding the Scholl Canyon Landfill that could be impacted by the Project. The analysis of each environmental factor considered the extent to which impacts could reasonably be determined to occur including offsite locations. No arbitrary City, County, or community boundary was applied that limited the evaluation of environmental impacts. Please also refer to Topical Response No. 4.
- L39-8 Please refer to Topical Response Nos. 1, 2, 3 and 4.
- L39-9 Please refer to Topical Response No. 1.
- L39-10 Please refer to Topical Response No. 1.
- L39-11 Please refer to Response to Comment No. L35-11

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- L39-12 Please refer to Response to Comment No L35-11. Please refer to also Draft MND Section 3.19, Topical Response No. 4.
- L39-13 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that during construction and operation of the Project no significant air quality impacts would occur. Please also refer to Topical Response No. 6.
- L39-14 Please refer to Topical Response No. 6.
- L39-15 Please refer to Topical Response Nos. 4 and 6, Response to Comment No. L23, and Draft MND Section 3.19.
- L39-16 Please refer to Topical Response No. 6 and Response to Comment No. L23.
- L39-17 The commenter expresses concern that the background pollutant concentrations used for the air modeling study were obtained from an ambient air quality monitoring station located four miles away in Pasadena and six miles away in Los Angeles on North Main Street.
- As outlined in 40 CRF 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B, and PSD monitoring guidance, and the data have been collected within the preceding 3 years. Use of these data are therefore appropriate for the Project analysis. Please refer to Topical Response No. 6.
- L39-18 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that during construction and operation of the Project no significant air quality impacts would occur. Please also refer to Topical Response No. 6.
- L39-19 The commenter expresses concern that relocating the landfill gas combustion for power generation from Grayson Power Plant to Scholl Canyon Landfill will add air pollutants to the surrounding residential and commercial receptors.



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- The MND has shown the emission increase of criteria pollutants and health risk assessment results for the region surrounding the Project do not exceed the significance thresholds set by SCAQMD.

The commenter makes the statement "The project's four reciprocating internal combustion engines have a capacity to burn 5,532 cubic feet per minute (scfm), while the MND reports that the landfill produces about 5,000 cubic feet per minute."

- The air dispersion model performed based on the emission rates from combusting landfill gas at their full capacity of 5,532 cubic feet per minute even though the current average landfill gas production is about 5,000 cubic feet per minute. The analysis of emissions at the higher fuel throughput rate is a conservative, worst-case analysis.

The commenter expresses concern that the air dispersion model does not appear to take into account "fugitive" gas or leaks from gas pipes.

- Emissions of methane or VOCs are not part of ambient air impact analyses models because ambient air quality standards do not exist for such pollutants. Additionally, the landfill currently has the potential to release fugitive emissions of methane and VOCs from the existing landfill gas collection system which is required to prevent even greater emissions of these pollutants through the soil and surface area of the landfill. The Biogas Renewable Generation Project does not change the configuration or operation of the landfill gas collection system.
- The project includes the decommissioning of a 5.5-mile gas transmission pipeline that transfers landfill gas to the Grayson plant and eliminates any existing potential for leaks from that pipeline. The Project will also require in the installation of a new and modern fuel delivery system to serve the engines. Please refer to Project Description of the Draft MND, Section 2. The Project will replace the existing fuel processing equipment with a new gas clean up and gas condensate system to supply the engines that will generate the electricity. The Project will not increase the potential for fugitive emissions.

The commenter expresses concern regarding the utilization of the landfill gas flare system once the power plant is built.

- The currently SCAQMD permitted flare system is used when the boilers at Grayson Power Plant can't burn the landfill gas due to maintenance or breakdown. Once the proposed engines are installed, the utilization of the

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flare system will not be greater than the current condition because landfill gas will continue to be flared only during engine maintenance or breakdown regardless of where those engines are located. In fact, the utilization of the flare is expected to be much less because new engines will likely to have less maintenance or breakdown events than the existing boilers at Grayson that are up to 70 years old.

The commenter makes the statement "If an anaerobic digestion system is built, will additional engines be required? How will this affect air quality?"

- Additional engines are not proposed as part of the Biogas Renewable Generation Project.
- If an anaerobic digestion system is ultimately proposed, it would also be subject to a robust air quality analysis and SCAQMD permitting program. If impacts from a future project exceed SCAQMD permitting standards (which are in line with CEQA significance determination criteria), then the project would not qualify for SCAQMD permits and would not be built.

The commenter questions "How will the new plant be integrated with a cost-effective leak detection and pipe integrity monitoring system for both closed and active parts of the landfill?"

- The City will comply with any applicable leak detection and repair regulations affecting the landfill. Both active and inactive components of the landfill will continue to be regulated by SCAQMD regardless of the Project. The SCAQMD regulations include provisions to ensure the efficiency and integrity of the landfill gas collection and methane destruction systems. Because the engines proposed for the Project will be used to destroy fugitive methane emissions from the landfill, they will also be regulated by SCAQMD to ensure compliance with federal and local landfill methane capture and destruction efficiency standards.

- L39-20 As stated in Sections 1.1 and 2.3.1 of the Draft MND, the existing transmission system will be used to deliver generated electricity into the electrical grid without a need for transmission facility upgrades. Connection will be to the existing 12.47 kV distribution line currently serving the Sanitation District's facilities and the existing gas processing equipment at the Project site.
- L39-21 Please refer to Topical Response No. 5.
- L39-22 Please refer to Topical Response No. 5.
- L39-23 Please refer to Topical Response No. 5.

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L39-24 Please refer to Topical Response No. 5.

Please refer to Section 3.15 of the Draft MND for a discussion of potential recreation impacts from the Project. The analysis concluded that during construction and operation of the Project no significant recreation impacts would occur.

L39-25 The Draft MND does address lighting and aesthetic impacts. As stated in Section 3.1 of the Draft MND, "Existing sources of light and glare in the Project vicinity include automatic night lighting in the equipment and scales facility and portable light towers at the adjacent SCLF. Existing light and glare sources at the Project site consist of security lighting located at the Sanitation District office trailers and overlooking the chemical storage areas. The lights are hooded and pointed downward in order to minimize glare. LFG flaring is contained within open cylinder flares, which have no direct flame and are not a source of light or glare." The analysis concluded that during construction and operation of the Project no significant aesthetics impacts would occur. Please also refer to Topical Response No. 5.

L39-26 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. Ongoing Scholl Canyon Landfill operations, including hazardous waste management associated with those operations, are not a component of the Project.

Please refer to Section 3.8 of the Draft MND for a discussion of potential hazardous materials impacts from the Project. The analysis concluded that during construction and operation of the Project no significant hazardous materials impacts would occur. Please also refer to Topical Response Nos. 1 and 8.

L39-27 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 1 and 8.

L39-28 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. Ongoing Scholl Canyon Landfill operations, including hazardous waste management associated with those operations, are not a component of the Project. The Project is not located in a "fill area" or "active" portion of the Landfill. Please refer to Topical Response Nos. 1 and 8.

Please refer to Section 3.8 of the Draft MND for a discussion of potential hazardous materials impacts from the Project. The analysis concluded that during

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construction and operation of the Project no significant hazardous materials impacts would occur.

- L39-29 Components of the Biogas Renewable Generation facility are described in Section 2 of the Draft MND, including the process to manage liquid condensate as a byproduct of landfill gas, use and storage of ammonia, and location of chemical storage.

Please refer to Section 3.8 of the Draft MND for a discussion of potential hazardous materials impacts from the Project. The analysis concluded that during construction and operation of the Project no significant hazardous materials impacts would occur. Please also refer to Topical Response No. 8.

- L39-30 Please refer to Topical Response No. 8.

- L39-31 A twelve-inch water line is the size required to provide the fire flow in accordance with the California Fire Code (CFC). Fire hydrants will be located within the Project site in accordance with the CFC. Please also refer to Topical Response No. 8.

- L39-32 The anaerobic digester is not part of the Project; there are no new transmission lines being constructed. The Project will not tie into So Cal Edison's high-tension transmission lines. The Project will tie into Glendale's existing electrical distribution system. The risk of fire due to the Project has been assessed and described in the Draft MND as less than significant. Access roads for the Project site will be designed to specification of the Glendale Building and Safety Code and Glendale Fire Code in order to accommodate emergency response vehicles. In addition, alternative site evacuation routes would be available via Scholl Canyon Road, and through various existing roads throughout the landfill depending on potential wildfire location. The Project does not include any component that would result in inadequate emergency access to the site or surrounding areas. Vehicles are not anticipated to block roadways or intersections, reduce speed below the speed limit on roadways, or to interfere with access of emergency vehicles. Therefore, based on the information presented in the Draft MND no impacts affecting emergency access would occur from the Project. Please also Please refer to Topical Response Nos. 8 and 9.

- L39-33 No water will not be used in the gas scrubbing process. Potable water will only be used for the restroom, emergency showers and eye wash stations, or where human contact could be expected, and for firefighting.

- L39-34 The Project will have one water closet and two sinks and be manned with two operators, eight hours a day, five days a week, the actual water consumption will

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be significantly less than the 450 gallons per day as provided in Section 3.18 of the Draft MND.

Please refer to the Draft MND Section 3.18 (Utilities and Service Systems) for a discussion of water usage for the Project.

- L39-35 The Pasadena Non-Potable Water Project has no connection to the Biogas Renewable Generation Project. The Final Pasadena Non-Potable Water Project EIR considered multiple alternatives to the Sheldon Non-Potable Water Reservoir, which is next to an existing reservoir near the Rose Bowl, and determined that the Sheldon Non-Potable Water Reservoir is the best alternative for this reservoir, as indicated in the Draft EIR which is Volume 1 of the Final EIR. Also, the portion of the existing Glendale Recycled Water System that will connect to the City of Pasadena includes conversion of an existing potable reservoir to a non-potable reservoir and in Pasadena's Draft EIR it is labeled as "Existing Glendale Potable Water Reservoir at Scholl Canyon". This reservoir is not in the landfill and is actually called the Glenoaks 1666 Tank. There are not four non-potable water storage facilities at the landfill listed in Pasadena's Draft or Final EIR. Additionally, all pumping facilities supplying the one existing tank, are already existing and receive power from the City of Glendale, none of them receive power from the landfill.
- L39-36 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. Ongoing Scholl Canyon Landfill operations are not a component of the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 1 and 7.
- L39-37 Please refer to Topical Response No. 7.
- L39-38 Please refer to Section 3.16 of the Draft MND for a discussion of potential emergency access impacts from the Project. The analysis concluded that during construction and operation of the Project no significant emergency access impacts would occur. Please also refer to Topical Response Nos. 7 and 8.
- L39-39 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Regardless of whether the landfill is open or closed, methane will continue to be produced by from the organic degradation of materials in the landfill. Landfill gas is required to be combusted.

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- L39-40      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-40 - Responses to Comments from Michael Mallory, dated October 19, 2017**

- L40-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L40-2      Please refer to Topical Response No. 6. Please refer to Response to Comment L24-1.
- L40-3      Please refer to Topical Response No. 8. Please refer to Response to Comment L24.
- L40-4      Please refer to Response to Comment L24-6. Please also refer to Topical Response Nos. 1, 8, and 9.
- L40-5      Please refer to Topical Response No. 7. Please refer to also Response to Comment L24-7.
- L40-6      Please refer to Topical Response No. 4. Please refer to also Response to Comment L24-8.
- L40-7      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L40-8      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-41 - Responses to Comments from Miri and Andrew Hinds, dated October 19, 2017**

- L41-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance

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with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-42 - Responses to Comments from Monica Cheang, dated October 19, 2017**

- L42-1 Please refer to Topical Response No. 6.
- L42-2 Please refer to Topical Response No. 6.
- L42-3 Please refer to Topical Response No. 6.
- L42-4 Please refer to Topical Response No. 8.
- L42-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L42-6 Please refer to Topical Response No. 7.
- L42-7 Please refer to Topical Response No. 4.

**L-43 - Responses to Comments from Peter Finestone, dated October 19, 2017**

- L43-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L43-2 Please refer to Topical Response Nos. 1 and 3.
- L43-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L43-4 Please refer to Topical Response No. 10.
- L43-5 Please refer to Topical Response No. 3.
- L43-6 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-44 - Responses to Comments from R Kataoka, dated October 19, 2017**

- L44-1 Please refer to Section 3.15 of the Draft MND for a discussion of potential recreation impacts from the Project. The analysis concluded that during



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construction and operation of the Project no significant recreation impacts would occur.

- L44-2 Please refer to Topical Response No. 6.
- L44-3 Please refer to Topical Response No. 6.
- L44-4 Please refer to Topical Response No. 6.
- L44-5 Please refer to Topical Response No. 8.
- L44-6 Please refer to Topical Response Nos. 1, 8, and 9.
- L44-7 Please refer to Topical Response No. 7.
- L44-8 Please refer to Topical Response No. 4.

**L-45- Responses to Comments from Sharon Landin, dated October 19, 2017**

- L45-1 The purpose of the existing site description on the MND document is to describe the general location of the landfill relative to the landmarks, such as parks, freeways, or, stadium. Please refer to Draft MND Sections 2.0 and 3.0. The air quality impact study does not omit or neglect the effect of the Project emissions on the surrounding and regional residential and commercial receptors. Please also refer to Topical Response No. 6.
- L45-2 The relevant wind patterns are included in the air dispersion modeling as part of the ambient air quality analysis. According to EPA's Guideline on Air Quality Models, one of the factor to determine the most representative meteorological data is the historical prevailing wind direction at the meteorological monitoring station. The Burbank meteorological monitoring station was selected based upon SCAQMD guidance and the inference that airflow at the Scholl Canyon Landfill will be similar to that experience at the Burbank monitoring station. Additionally, five years of meteorological data were studied to account the variations of wind direction because there is no meteorological monitoring station at the Project site.
- L45-3 The net emission increase during the construction phase of the Project was calculated by subtracting the total construction emissions, which is the total emissions from flaring and earth-moving activity, from baseline emissions. The flare emissions from the Project are based upon historic emission factors, which were calculated by averaging the emission factors reported in SCAQMD Annual Emission Reports (AER) from 2011 through 2014 and the results of source test conducted in 2015. The baseline emissions were based on the average emissions

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from landfill gas combustion in the boilers at Grayson Power Plant as reported in 2011 through 2015 SCAQMD AERs.

To determine if Project Emissions are within SCAQMD's Localized Significance Thresholds (LST), it is appropriate to consider only construction emissions (including flare emissions), without subtracting existing boiler emissions. These emissions are shown to be below SCAQMD LSTs. Please also refer to Topical Response No. 6.

- L45-4 The Project description includes a narrative that describes the flaring activity during construction. Please refer to Draft MND Section 2.0. The Draft MND also analyzes the impacts of flaring in Section 3.3.
- L45-5 As outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B, and PSD monitoring guidance, and the data have been collected within the preceding 3 years. Use of these data are therefore appropriate for the Project analysis. Please refer to Topical Response No. 6.
- L45-6 The cancer risk presented in the Draft EIR of the landfill expansion project is below the significance threshold of 10 in 1 million. The maximum cancer risk of the landfill expansion project is 1.86 in 1 million for Variation 1 and 1.98 in 1 million for Variation 2. The potential hazardous air pollutants and health risk presented in the Draft MND for the Biogas Renewable Generation Project shows the highest health risk levels of the Project are below significance thresholds with a Maximum Increase in Cancer Risk (MICR) of 0.05 in 1 million. Combined, the two projects will not present a MICR greater than  $(1.98 + .05)$  2.03 in 1 million. Furthermore, these highest risk levels are based on the concentration of hazardous pollutants at the boundary of the landfill. The risk levels will decrease further from the site due to the lower ambient concentrations of pollutants, relative to distance from the Project location and the projects do not result in an offsite cancer burden. Please also refer to Topical Response No. 4.
- L45-7 Please refer to Topical Response Nos. 4 and 6 and Response to Comment No. L23.
- L45-8 Please refer to Topical Response No. 4 and Response to Comment No. L23.

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- L45-9 Please refer to Response to Comment No. L23. Please refer to Topical Response Nos. 1 and 4.
- L45-10 Please refer to Topical Response No. 1, 2, and 3.
- L45-11 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L45-12 As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations. Currently, the landfill gas produced at the landfill is transported via pipeline to the Grayson Power Plant and used to supplement natural gas to produce power that is transmitted to the electric grid. The City of Glendale is proposing to continue to utilize the methane-rich renewable landfill gas as fuel to generate electricity at the Scholl Canyon Landfill instead of transferring it off-site to the Grayson Power Plant, but the City is not required to do so. The landfill gas must be combusted on site via permitted flaring or can be used in a beneficial manner, such as in the Project. The Biogas Renewable Generation Project has a number of benefits to the environment, the City of Glendale, and its citizens including:
- Provide beneficial use of naturally occurring landfill gas as fuel for power generating equipment;
  - Offset the cost to procure power produced by other means by utilizing a free source of landfill gas to produce power;
  - Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio; and
  - Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.
- L45-13 The Draft MND did not identify any significant health risks to residents. Please refer to Topical Response No. 6.

**L-46 - Responses to Comments from Suzanne Smith, dated October 19, 2017**

- L46-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L46-2 Please refer to Topical Response Nos. 1 and 3.

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- L46-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L46-4 Please refer to Topical Response No. 10.
- L46-5 Please refer to Topical Response No. 3.
- L46-6 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-47 - Responses to Comments from William Malone, dated October 19, 2017**

- L47-1 Please refer to Topical Response No. 6.
- L47-2 Please refer to Topical Response No. 6.
- L47-3 Please refer to Topical Response No. 6.
- L47-4 Please refer to Topical Response No. 8.
- L47-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L47-6 Please refer to Topical Response No. 7.
- L47-7 Please refer to Topical Response No. 4.

**L-48- Responses to Comments from Audrey Mandelbaum, dated October 20, 2017**

- L48-1 Please refer to Topical Response No. 10.
- L48-2 Regarding potential noise impacts, please refer to Section 3.12 of the Draft MND. Regarding potential traffic impacts, please refer to Section 3.16 of the Draft MND. Please also refer to Topical Response No. 9.
- L48-3 Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L48-4 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.

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**L-49 - Responses to Comments from Burt Culver, dated October 20, 2017**

- L49-1 Please refer to Topical Response Nos. 2 and 6.
- L49-2 Please refer to Topical Response No. 2.
- L49-3 Please refer to Topical Response Nos. 2, and 6.
- L49-4 The comment reflects the commenter's personal opinion. Please refer to Topical Response Nos. 2 and 6.
- L49-5 Please refer to Topical Response Nos. 2 and 6.
- L49-6 Please refer to Topical Response Nos. 2, 4, and 6.
- L49-7 Please refer to Topical Response No. 2 and 6.

**L-50 - Responses to Comments from Dianna Jaynes, dated October 20, 2017**

- L50-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L50-2 Please refer to Topical Response Nos. 1 and 3.
- L50-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L50-4 Please refer to Topical Response No. 10.
- L50-5 Please refer to Topical Response No. 3.
- L50-6 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-51 - Responses to Comments from Erik Blank, dated October 20, 2017**

- L51-1 Please refer to Topical Response Nos. 5 and 10.
- L51-2 The Draft MND has been corrected to reference Dahlia Elementary School as the closest school to the landfill.

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L51-3 Please refer to Topical Response No. 10.

**L-52 - Responses to Comments from Jennifer Hoffman, dated October 20, 2017**

L52-1 The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 3.

L52-2 This is a comment about air quality as it relates to another project, the Grayson Repowering Project. The commenter is not commenting on the Biogas Renewable Generation Project; however, the commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 2 and 6.

L52-3 Please refer to Topical Response No. 6.

L52-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 3.

**L-53 - Responses to Comments from Joel Aldape, dated October 20, 2017**

L53-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. There Project does not propose an expansion of the existing Scholl Canyon Landfill. Please also refer to Topical Response No. 1.

L53-2 Please refer to Topical Response No. 10.

L53-3 Please refer to Topical Response No. 10.

L53-4 Please refer to Topical Response No. 10.

**L-54 - Responses to Comments from Joel Arquillos, dated October 20, 2017**

L54-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response Nos. 6 and 10.

L54-2 Please refer to Topical Response No. 10.

**L-55 - Responses to Comments from John Crooke, dated October 20, 2017**

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- L55-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L55-2 Please refer to Topical Response Nos. 1 and 3.
- L55-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L55-4 Please refer to Topical Response No. 10.
- L55-5 Please refer to Topical Response No. 3.
- L55-6 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-56 - Responses to Comments from John Dunlop, dated October 20, 2017**

- L56-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L56-2 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- L56-3 Regarding potential noise impacts, please refer to Section 3.12 of the Draft MND. Regarding potential traffic impacts, please refer to Section 3.16 of the Draft MND. Please also refer to Topical Response No. 9.
- L56-4 Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L56-5 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L56-6 Please refer to Topical Response No. 10.



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L56-7 Please refer to Topical Response No. 10.

L56-8 Please refer to Topical Response No. 10.

**L-57 - Responses to Comments from Justin King, dated October 20, 2017**

L57-1 The comment is a general statement about the commenter's opinion about (or preference about) the Project. The Project impacts were analyzed in the MND; this comment does not disclose how or where Project impacts were underestimated. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 3 through 9.

L57-2 Please refer to Topical Response No. 3.

L57-3 Please refer to Topical Response Nos. 1, 3 and 4.

L57-4 In the interest of transparency the City has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. Additional information regarding the Project can be found on the Project website at: <http://glendalebiogasgeneration.com/> and on the Scholl Canyon Landfill website home page at: <https://www.schollcanyonlandfill.org/>. The City will also be holding a public meeting to consider the MND and Biogas Project approvals. Please also refer to Topical Response No. 10.

L57-5 No, the low pressure natural gas pipeline will not be double walled. The pressure in the pipeline will be the same as residential gas pipeline pressure provided by Southern California Gas Company and it is not standard practice to double wall residential pipelines. The pipeline will be secured to the ground by standard H pipe support system utilizing PS-200 Power Strut support structure. In case of earthquake, an automatic shut off valve will be actuated to shut off the gas flow and in case of pipeline failure caused by other than earthquake low pipeline pressure alarm will sound to alert operator of pipeline failure and equipment will stop operating.

L57-6 Yes, a real-time telemetry alarm system is being used for the Project.

L57-7 The Aqueous Ammonia will be stored in a stainless-steel vessel with a concrete containment structure large enough in volume to support all the ammonia and also retain stormwater. Please refer to Topical Response No. 8.

L57-8 Carbon monoxide catalyst (CMC) is Aluminum Oxide. It is used in the stainless-steel CMC housing contains a honeycombed structure impregnated with the

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CMC. Other than within the catalyst housing, no catalyst will be stored at the Project site. Once the catalyst is spent and no longer effective, the entire honeycomb will be recycled and replaced. Per 29 CFR 1910.1200 CMC is classified as a non-hazardous solid. There are no liquids or gases used to cause a chemical reaction of the CMC.

- L57-9      There is no volume of impurities from condensate stored on site. Condensate will be discharged to the waste water sewer in accordance with the City's waste water discharge permit.
- L57-10     Hazardous waste that will be generated by the Project is spent engine oil and oil filters, and perhaps nominal amounts of typical household-type products that may be used for operations and maintenance. The waste oil will be stored within double walled tanks located within each of the engine enclosures. Household type hazardous waste materials will be disposed of as required by law.
- L57-11     Yes, SCAQMD has submitted comments regarding the Project. Please refer to Comment Letter No. L23. Please also refer to Topical Response No. 6.
- L57-12     Yes, groundwater and potential water quality impacts from this Project (including potential impacts to that well generally) are discussed in Section 3.9 of the Draft MND. The analysis concluded that no significant water quality impacts would occur from the Project. Please refer to Topical Response No. 1.
- L57-13     The commenter expresses concern that the background pollutant concentrations used for the air modeling study were obtained from an ambient air quality monitoring station located four miles away in Pasadena and six miles away in Los Angeles on North Main Street.
- As outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B, and PSD monitoring guidance, and the data have been collected within the preceding 3 years. Use of these data are therefore appropriate for the Project analysis. Please also refer to Topical Response No. 6.

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**L-58 - Responses to Comments from Kenny Sylvain, dated October 20, 2017**

- L58-1 Please refer to Topical Response No. 6.
- L58-2 Please refer to Topical Response No. 6.
- L58-3 Please refer to Topical Response No. 6.
- L58-4 Please refer to Topical Response No. 8.
- L58-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L58-6 Please refer to Topical Response No. 7.
- L58-7 Please refer to Topical Response No. 4.
- L58-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-59 - Responses to Comments from Kevin Tseng, dated October 20, 2017**

- L59-1 Please refer to Topical Response No. 10.

**L-60 - Responses to Comments from Lisa Karahalios, dated October 20, 2017**

- L60-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L60-2 Please refer to Topical Response No. 2.
- L60-3 The comment is a general statement about the commenter's opinion of (or preference about) the Scholl Canyon Landfill, and not specifically directed to the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 6 and 9.

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**L-61 - Responses to Comments from Marites Ruano, Krys, Yric, Andrew, and Nikole Howard,  
dated October 20, 2017**

- L61-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figureoa Street, Los Angeles, CA 90041.

**L-62 - Responses to Comments from Marti Doughty, dated October 20, 2017**

- L62-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L62-2      Please refer to Topical Response No. 6.

**L-63 - Responses to Comments from Mary Lynch, dated October 20, 2017**

- L63-1      The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L63-2      Depending on the approval and permitting processes, including the process of selecting and retaining contractors, construction is conservatively estimated to begin in early 2019. However, site preparation activities could begin in late 2018.  
.
- L63-3      As stated in Section 2.1 of the Draft MND:  
  
At the current fill rate, the closing date of the landfill is estimated to be in the mid 2020's. A proposed but not yet approved expansion of the landfill may increase the life of the landfill up to an additional 22 to 32 years (AECOM, 2014). The landfill's permitted capacity is based on volume; therefore, the closing date of the landfill, including the request for increased life, could be sooner or later depending on disposal rates as well as regulatory approval for expansion.
- L63-4      As of 2014 the landfill was receiving approximately 1,400 tons per day of solid waste.

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- L63-5 No, the Biogas Renewable Generation Project is not designed to extend the life of the Scholl Canyon Landfill. The Project would be located on a site within the Scholl Canyon Landfill where landfill gas is already collected and processed. The amount of waste that can be disposed of at Scholl Canyon Landfill is limited to the volume approved by existing permit. The volume of landfill gas generated is and would be fixed dependent on the volume and type of waste being placed in the landfill which is limited by the existing permit. Landfill gas would therefore continue to be generated by the landfill for many years well after landfill closure. The volume of landfill gas produced without any landfill expansion is sufficient to supply landfill gas to the Project throughout its 20-year life expectancy. The Project was designed, and equipment selected to utilize the existing volume of landfill gas currently generated and does not have the capacity to accept any additional volume of landfill gas. In addition, the life expectancy of the electrical generation equipment proposed is approximately 20 years. The Project has independent utility and is not dependent on expansion of the existing landfill. Please also refer to Topical Response No. 1.
- L63-6 No. The approximately 5.5-mile-long landfill gas pipeline that currently extends from the Scholl Canyon Landfill to the Grayson Power Plant is located in City of Glendale easements and rights-of-way.
- L63-7 No, the current facilities at the Scholl Canyon Landfill are supplied electrical service by an existing 12.47 kV distribution line. This distribution line will serve as the connection point for the Project and the City's distribution system. The existing electrical transmission system at Scholl Canyon Landfill is adequate to support the electrical transmission needs of the Project.
- L63-8 Yes, the Lead Agency is responsible for the preparation and consideration of the IS/MND. See California Public Resources Code Section \_\_\_\_\_. Please refer to Section 1.3 of the Draft MND for a discussion of Lead Agency for the Project.
- L63-9 Please refer to the City of Glendale's Scholl Canyon Landfill for current status of the Scholl Canyon Landfill Expansion Project: [www.schollcanyonlandfill.org](http://www.schollcanyonlandfill.org). See also Topical Response Nos. 1 and 4.
- L63-10 See Topical Response No. 1. The Project would be located on a site within the Scholl Canyon Landfill where landfill gas is already collected and processed. The amount of waste that can be disposed of at Scholl Canyon Landfill is limited to the volume approved by existing permit. The volume of landfill gas generated is and would be fixed dependent on the volume and type of waste being placed in the landfill which is limited by the existing permit. Landfill gas would therefore continue to be generated by the landfill for many years well after landfill closure.

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The volume of landfill gas produced without any landfill expansion is expected to supply landfill gas to the Project throughout its 20-year life expectancy although the volume of gas will continually decrease some over time. The Project was designed, and equipment selected to utilize the existing volume of landfill gas currently generated and does not have the capacity to accept any additional volume of landfill gas. In addition, the life expectancy of the electrical generation equipment proposed is approximately 20 years. The Project has independent utility and is not dependent on expansion of the existing landfill.

L63-11 Yes, see Topical Response No. 1. The volume of landfill gas produced without any landfill expansion is sufficient to supply landfill gas to the Project throughout its 20-year life expectancy. The Project was designed, and equipment selected to utilize the existing volume of landfill gas currently generated and does not have the capacity to accept any additional volume of landfill gas. In addition, the life expectancy of the electrical generation equipment proposed is approximately 20 years. The Project has independent utility and is not dependent on expansion of the existing landfill.

L63-12 Please refer to Topical Response No. 10.

L63-13 Please refer to Topical Response No. 10.

L63-14 Please refer to Topical Response No. 10.

**L-64 - Responses to Comments from C. Michael Frey, dated October 20, 2017**

L64-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.

The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041.

L64-2 Potential air quality impacts are discussed in Section 3.3 of the Draft MND. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.

L64-3 Potential air quality impacts are discussed in Section 3.3 of the Draft MND. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.

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- L64-4 Potential traffic impacts are discussed in Section 3.16 of the Draft MND. The analysis concluded that no significant impacts would occur to traffic or transportation from the Project. Please also refer to Topical Response No. 9.
- L64-5 Potential noise impacts are discussed in Section 3.12 of the Draft MND. The analysis concluded that no significant noise impacts would result from the Project. Please also refer to Topical Response No. 9.
- L64-6 Please refer to Topical Response No. 10.
- L64-7 Please refer to Topical Response No. 10.

**L-65 - Responses to Comments from Mindy O'Brien, dated October 20, 2017**

- L65-1 The comment is a general statement about the commenter's opinion of (or preference about) the Scholl Canyon Landfill and not a comment about the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-66 - Responses to Comments from Nik Hoffman, dated October 20, 2017**

- L66-1 Please refer to Response to Comment No. L52-1.
- L66-2 Please refer to Response to Comment No. L52-2.
- L66-3 Please refer to Response to Comment No. L52-3.
- L66-4 Please refer to Response to Comment No. L52-4.

**L-67 - Responses to Comments from Pia Harris, dated October 20, 2017**

- L67-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072 and in the interest of transparency has provided documentation regarding the Project and regular status updates on the City's website at: <http://www.glendaleca.gov/environmental>. Additional information regarding the Project can be found on the Project website at: <http://glendalebiogasgeneration.com/> and on the Scholl Canyon Landfill website home page at: <https://www.schollcanyonlandfill.org/>. Please also refer to Topical Response No. 10.
- One of the environmental and safety benefits of their Project will be the ability to abandon the existing 5.5-mile-long gas pipeline running between the Scholl Canyon Landfill and the Grayson Power Plant as landfill gas will no longer be combusted at the Grayson Power Plant.



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- L67-2 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- L67-3 Please refer to Section 3.3 of the Draft MND for a discussion of potential air quality impacts from the Project. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- L67-4 Regarding potential noise impacts, please refer to Section 3.12 of the Draft MND. Regarding potential traffic impacts, please refer to Section 3.16 of the Draft MND. Please also refer to Topical Response Nos. 6 and 9.
- L67-5 Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L67-6 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L67-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. See also Topical Response Nos. 2 and 6.

**L-68 - Responses to Comments from Pricila Kasha, dated October 23, 2017**

- L68-1 Please refer to Topical Response No. 6.
- L68-2 Please refer to Topical Response No. 6.
- L68-3 Please refer to Topical Response No. 6.
- L68-4 Please refer to Topical Response No. 8.
- L68-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L68-6 Please refer to Topical Response No. 7.
- L68-7 Please refer to Topical Response No. 4.

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**L-69 - Responses to Comments from Rachel Arruejo, dated October 20, 2017**

- L69-1 Please refer to Topical Response No. 6.
- L69-2 Please refer to Topical Response No. 6.
- L69-3 Please refer to Topical Response No. 6.
- L69-4 Please refer to Topical Response No. 8.
- L69-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L69-6 Please refer to Topical Response No. 7.
- L69-7 Please refer to Topical Response No. 4.

**L-70 - Responses to Comments from Ryan Reilly, dated October 20, 2017**

- L70-1 The comment is a general statement about the commenter's opinion of (or preference about) the Scholl Canyon Landfill and not about the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-71 - Responses to Comments from Timothy Campbell, dated October 20, 2017**

- L71-1 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.  
  
The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041.
- L71-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Biogas is a Renewable Energy Portfolio eligible renewable resource (CEC, 2017).<sup>17</sup> Renewable resources include, biogas, solar, wind, geothermal and small hydro. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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<sup>17</sup> California Energy Commission, 2017, Renewables Portfolio Standard Eligibility Commission Guidebook Ninth Edition, available at [http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317\\_20170427T142045\\_RPS\\_Eligibility\\_Guidebook\\_Ninth\\_Edition\\_Revised.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317_20170427T142045_RPS_Eligibility_Guidebook_Ninth_Edition_Revised.pdf)

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- L71-3 Potential air quality impacts are discussed in Section 3.3 of the Draft MND. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- Regarding potential noise impacts, please refer to Section 3.12 of the Draft MND. Regarding potential traffic impacts, please refer to Section 3.16 of the Draft MND. Please also refer to Topical Response No. 9.
- L71-4 Please refer to Topical Response No. 10.
- The Draft MND and Appendices with supporting studies is 1,424 pages in length and not 35 pages.
- L71-5 Please refer to Topical Response No. 10.

**L-72 - Responses to Comments from Antonio Bautista, dated October 20, 2017**

- L72-1 The comment is a general statement expressing the commenter's support of the Project and include constructive suggestions pertaining to education on biogas, energy and other sustainability measures. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L72-2 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L72-3 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-73 - Responses to Comments from Trish and Frank Defoe, dated October 20, 2017**

- L73-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.
- L73-2 Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.

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- L73-3      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-74 - Responses to Comments from Trish and Frank Defoe, dated October 20, 2017**

- L74-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.
- L74-2      Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L74-3      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-75 - Responses to Comments from Veronica Diaz, dated October 20, 2017**

- L75-1      The Project location is within the site boundary of the Scholl Canyon Landfill and is located entirely within the jurisdictional boundaries of the City of Glendale. The entrance to the Scholl Canyon Landfill site is 7721 North Figueroa Street, Los Angeles, CA 90041. Please also refer to Topical Responses Nos. 6 and 10.

**L-76 - Responses to Comments from Walt Kasha, dated October 23, 2017**

- L76-1      Please refer to Topical Response No. 6.
- L76-2      Please refer to Topical Response No. 6.
- L76-3      Please refer to Topical Response No. 6.
- L76-4      Please refer to Topical Response No. 8.
- L76-5      Please refer to Topical Response Nos. 1, 8, and 9.

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L76-6 Please refer to Topical Response No. 7.

L76-7 Please refer to Topical Response No. 4.

**L-77 - Responses to Comments from Brian F Medina, dated October 21, 2017**

L77-1 Please refer to Topical Response No. 6.

L77-2 Please refer to Topical Response No. 6.

L77-3 Please refer to Topical Response No. 6.

L77-4 Please refer to Topical Response No. 8.

L77-5 Please refer to Topical Response Nos. 1, 8, and 9.

L77-6 Please refer to Topical Response No. 7.

L77-7 Please refer to Topical Response No. 4.

**L-78 - Responses to Comments from Dan Kruse, dated October 21, 2017**

L78-1 Please refer to Topical Response No. 6.

L78-2 Please refer to Topical Response No. 6.

L78-3 Please refer to Topical Response No. 6.

L78-4 Please refer to Topical Response No. 8.

L78-5 Please refer to Topical Response Nos. 1, 8, and 9.

L78-6 Please refer to Topical Response No. 7.

L78-7 Please refer to Topical Response No. 4.

**L-79 - Responses to Comments from Daniel Brotman, dated October 21, 2017**

L79-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

L79-2 Please refer to Topical Response Nos. 2, 3 and 4.

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- L79-3 Health risk assessments were conducted for both the Grayson Repowering Project and the Biogas Renewable Generation Project. Both assessments show that health impacts are below a level of significance. See Topical Response No. 6, please also see Appendix A.5 to the IS/MND; the Health Risk Assessment is attached to the Final EIR for the Grayson Repowering Project at Appendix D.5.

The City adequately considered population density in the modeling. Population data are used for health risk assessments in two ways. First, when the maximum increase in cancer risk exceeds 1.0 in one million, population density is used to estimate the cancer burden rate (estimated cancer cases based upon the population within the geographic area in which cancer risk exceeds 1.0 in one million). For the Project, the resulting cancer burden is zero, regardless of local population density, because there is no area outside of the facility where the cancer risk is equal to or greater than 1.0 in one million.

Population density also factors in to the AERMOD dispersion model. The model allows for the distinction between general urban, versus rural land use. Urban land use results in characteristics that may inhibit regional dispersion of the Project exhaust plume. When the urban analysis setting is triggered, regional population by county, combined with county surface area are used as model inputs. In this case, however, population density is considered on a regional basis, rather than a local basis and the values that were used in the AERMOD analysis were selected based upon SCAQMD guidance.

- L79-4 The Grayson Repowering Project was analyzed in an EIR; the Final EIR is available at the following address: [www.graysonrepowering.com](http://www.graysonrepowering.com). The Biogas Renewable Generation Project is a separate project with independent utility. Both project separately analyzed their respective impacts relative to fires, earthquakes and flooding. Please refer to Topical Response Nos. 2, 4, 7, and 8.

- L79-5 Please refer to Response to Comment No. L79-3. There are no health risk mitigation requirements because the results of the health risk assessment for the Project demonstrates that impacts are below significance thresholds.

- L79-6 See Topical Response Nos. 2 and 6. Natural gas will not be pumped up from Grayson, the natural gas used in the Biogas Project is being purchased from SoCalGas as described in MND Section 2.3.2. The pipeline between Scholl Canyon and the Grayson Power Plant is being decommissioned as part of the Biogas Project since it is not needed for either project.

Some natural gas will be used to maintain the heating value of the gas consumed by the engines. SCAQMD permits specify that the natural gas consumed cannot exceed 10% of the energy supplied to the engines. GWP must

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distinguish between natural gas and landfill gas used for power generation and only that electricity that is produced from the combustion of landfill gas qualifies to be applied toward the RPS standard. Electricity generated from the combustion of natural gas will continue to be excluded from RPS determinations.

The blend of fuels has no impact on the quantification of criteria pollutants in the MND. Emission standards for new engines reflect the blend of fuel. The MND considers hazardous air pollutants for landfill gas because that fuel tends to present greater emissions. Notice of the MND, in which analysis of air quality impacts was completed, was provided. See Topical Response No. 10

L79-7      After the power plant is built, the flare system is intended to be utilized in events where the landfill gas can't be combusted in the engines, such as during engine maintenance, breakdowns, or other emergency events.

The Project serves as a methane emissions control system in accordance with local and federal regulations. In other words, it reduces methane emissions that are a byproduct of waste decomposition in the Landfill. Methane emissions are included in the greenhouse gas (GHG) section of the MND. See also Topical Response No. 6.

**L-80 - Responses to Comments from Hury Babayan, dated October 21, 2017**

- L80-1      Please refer to Topical Response No. 6.
- L80-2      Please refer to Topical Response No. 6.
- L80-3      Please refer to Topical Response No. 6.
- L80-4      Please refer to Topical Response No. 8.
- L80-5      Please refer to Topical Response Nos. 1, 8, and 9.
- L80-6      Please refer to Topical Response No. 7.
- L80-7      Please refer to Topical Response No. 4.

**L-81 - Responses to Comments from Jane Demian, dated October 21, 2017**

- L81-1      The Biogas Renewable Generation Project has independent utility from the Grayson Repowering Project. Please also refer to Topical Response No. 2.
- L81-2      Please refer to Topical Response Nos. 7 and 8.



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- L81-3 The Draft MND includes air dispersion modeling and a health risk assessment to assess the impact to the local ambient air quality and public health. The result of the models demonstrate that the air quality and public health impacts of the Project are below significance thresholds established by SCAQMD. Please also refer to Topical Responses No. 2, 4, and 6.
- L81-4 The Biogas Renewable Generation Project is not designed to extend the life of the Scholl Canyon Landfill. The Project would be located on a site within the Scholl Canyon Landfill where landfill gas is already collected and processed. The amount of waste that can be disposed of at Scholl Canyon Landfill is limited to the volume approved by existing permit. The volume of landfill gas generated is and would be fixed dependent on the volume and type of waste being placed in the landfill which is limited by the existing permit. Landfill gas would therefore continue to be generated by the landfill for many years well after landfill closure. The volume of landfill gas produced without any landfill expansion is sufficient to supply landfill gas to the Project throughout its 20-year life expectancy. The Project was designed, and equipment selected to utilize the existing volume of landfill gas currently generated and does not have the capacity to accept any additional volume of landfill gas. Please also refer to Topical Response No. 1.
- L81-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Section 3.8 (Hazards and Hazardous Materials) of the Draft MND and Topical Response No. 8.
- L81-6 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.

**L-82 - Responses to Comments from Pat Hill, dated October 21, 2017**

- L82-1 Please refer to Topical Response No. 6.
- L82-2 Please refer to Topical Response No. 6.
- L82-3 Please refer to Topical Response No. 6.
- L82-4 Please refer to Topical Response No. 8.
- L82-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L82-6 Please refer to Topical Response No. 7.
- L82-7 Please refer to Topical Response No. 4.

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**L-83 - Responses to Comments from Angela Vukos, dated October 22, 2017**

- L83-1 Please refer to Topical Response No. 6.
- L83-2 Please refer to Topical Response No. 6.
- L83-3 Please refer to Topical Response No. 6.
- L83-4 Please refer to Topical Response No. 8.
- L83-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L83-6 Please refer to Topical Response No. 7.
- L83-7 Please refer to Topical Response No. 4.

**L-84 - Responses to Comments from Art and Socorro Vilches, dated October 22, 2017**

- L84-1 Please refer to Topical Response No. 6.
- L84-2 Please refer to Topical Response No. 6.
- L84-3 Please refer to Topical Response No. 6.
- L84-4 Please refer to Topical Response No. 8.
- L84-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L84-6 Please refer to Topical Response No. 7.
- L84-7 Please refer to Topical Response No. 4.

**L-85 - Responses to Comments from Lynn Woods, dated October 22, 2017**

- L85-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 6 and 8.
- L85-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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- L85-3 As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations. Currently, the landfill gas produced at the landfill is transported via pipeline to the Grayson Power Plant and used to supplement natural gas to produce power that is transmitted to the electric grid. The City of Glendale is proposing to continue to utilize the methane-rich renewable landfill gas as fuel to generate electricity at the Scholl Canyon Landfill instead of transferring it off-site to the Grayson Power Plant, but the City is not required to do so. The landfill gas must be combusted on site via permitted flaring or can be used in a beneficial manner, such as in the Project. The Biogas Renewable Generation Project has a number of benefits to the environment, the City of Glendale, and its citizens including:
- Provide beneficial use of naturally occurring landfill gas as fuel for power generating equipment;
  - Offset the cost to procure power produced by other means by utilizing a free source of landfill gas to produce power;
  - Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio; and
  - Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.
- L85-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.
- L85-5 Please refer to Topical Response No. 10.
- L85-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The Project is not a federal project or a federally subsidized project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-86 - Responses to Comments from Madeleine Avirov, dated October 22, 2017**

- L86-1 Please refer to Topical Response No. 6.
- L86-2 Please refer to Topical Response No. 6.

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- L86-3 Please refer to Topical Response No. 6.
- L86-4 Please refer to Topical Response No. 8.
- L86-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L86-6 Please refer to Topical Response No. 7.
- L86-7 Please refer to Topical Response No. 4.

**L-87 - Responses to Comments from Maureen Perkins, dated October 22, 2017**

- L87-1 Please refer to Topical Response No. 6.
- L87-2 Please refer to Topical Response No. 6.
- L87-3 Please refer to Topical Response No. 6.
- L87-4 Please refer to Topical Response No. 8.
- L87-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L87-6 Please refer to Topical Response No. 7.
- L87-7 Please refer to Topical Response No. 4.

**L-88 - Responses to Comments from Mitchell Rubenstein, dated October 22, 2017**

- L88-1 Please refer to Topical Response No. 6.
- L88-2 Please refer to Topical Response No. 6.
- L88-3 Please refer to Topical Response No. 6.
- L88-4 Please refer to Topical Response No. 8.
- L88-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L88-6 Please refer to Topical Response No. 7.
- L88-7 Please refer to Topical Response No. 4.

**L-89 - Responses to Comments from Renee Holt, dated October 22, 2017**

- L89-1 Please refer to Topical Response No. 6.

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- L89-2 Please refer to Topical Response No. 6.
- L89-3 Please refer to Topical Response No. 6.
- L89-4 Please refer to Topical Response No. 8.
- L89-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L89-6 Please refer to Topical Response No. 7.
- L89-7 Please refer to Topical Response No. 4.

**L-90 - Responses to Comments from Bethsaida A. Castillo-Cifuentes, dated October 23, 2017**

- L90-1 Thank you for transmittal of Comment Letter No. L90. The comments have been included in the Final MND.
- L90-2 Please refer to Topical Response No. 6.
- L90-3 Please refer to Topical Response No. 6.
- L90-4 Please refer to Topical Response No. 6.
- L90-5 Please refer to Topical Response No. 8.
- L90-6 Please refer to Topical Response Nos. 1, 8, and 9.
- L90-7 Please refer to Topical Response No. 7.
- L90-8 Please refer to Topical Response No. 4.

**L-91 - Responses to Comments from Jennifer Hoffman, dated October 23, 2017**

- L91-1 Thank you for transmittal of Comment Letter No. L52 from Jennifer Hoffman, dated October 20, 2017. The comments have been included in the Final MND. Please refer to response to Comment Letter No. L52.

**L-92 - Responses to Comments from Mark Whitney, dated October 23, 2017**

- L92-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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L92-2 Please refer to Topical Response No. 6.

**L-93 - Responses to Comments from Matthew Paine, dated October 23, 2017**

- L93-1 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L93-2 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L93-3 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L93-4 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L93-5 Please refer to Topical Response No. 1.
- L93-6 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the

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L93-7 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L93-8 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is being evaluated under a separate CEQA process. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

**L-94 - Responses to Comments from Betsy Randall Wise, dated October 23, 2017**

- L94-1 Please refer to Topical Response No. 6.
- L94-2 Please refer to Topical Response No. 6.
- L94-3 Please refer to Topical Response No. 6.
- L94-4 Please refer to Topical Response No. 8.
- L94-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L94-6 Please refer to Topical Response No. 7.
- L94-7 Please refer to Topical Response No. 4.

**L-95 - Responses to Comments from Brooke Owen, dated October 29, 2017**

- L95-1 Thank you for transmittal of comment letter L95. The comments have been included in the Final MND.
- L95-2 Please refer to Topical Response No. 6.
- L95-3 Please refer to Topical Response No. 6.
- L95-4 Please refer to Topical Response No. 6.

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- L95-5 Please refer to Topical Response No. 8.
- L95-6 Please refer to Topical Response Nos. 1, 8, and 9.
- L95-7 Please refer to Topical Response No. 7.
- L95-8 Please refer to Topical Response No. 4.

**L-96 - Responses to Comments from Burt Culver, dated October 31, 2017**

- L96-1 The City is has not been planning the proposed Biogas Renewable Generation Project under a "separate non-CEQA process." A mitigated negative declaration ("MND") for the proposed Biogas Renewable Generation Project was prepared and a draft was circulated for extended public review from August 31, 2017 that was twice extended until November 9, 2017. A link to the Biogas Renewable Generation Project Mitigated Negative Declaration is available here: <http://www.glendaleca.gov/home/showdocument?id=38536>. Indeed, the commenter submitted multiple comment letters via email (October 20, 2017; October 31, 2017; November 5, 2017 and November 3, 2017) to the draft Mitigated Negative Declaration. Thus, the claim that the City is planning to build a new 12 MW plant under a "separate non-CEQA process" is not an accurate statement.
- L96-2 Please refer to Topical Response Nos. 2, 3, and 4.
- L96-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 2.  
  
It should also be noted that if Grayson was to be replaced with 100 % 'clean energy', the landfill gas still must be combusted. As stated in Sections 1 and 2 of the Draft MND, landfill gas is generated as a by-product of waste decomposition and will continue to be generated regardless of whether expansion of the existing landfill occurs. Landfill gas is required to be combusted according to SCAQMD rules and regulations.

**L-97 - Responses to Comments from Amy Goldman Koss, dated November 2, 2017**

- L97-1 Please refer to Topical Response No. 6.
- L97-2 Please refer to Topical Response No. 6.
- L97-3 Please refer to Topical Response No. 6.



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- L97-4 Please refer to Topical Response No. 8.
- L97-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L97-6 Please refer to Topical Response No. 7.
- L97-7 Please refer to Topical Response No. 4.

**L-98 - Responses to Comments from Herant Khanjian, dated November 2, 2017**

- L98-1 Please refer to Topical Response No. 6.
- L98-2 Please refer to Topical Response No. 6.
- L98-3 Please refer to Topical Response No. 6.
- L98-4 Please refer to Topical Response No. 8.
- L98-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L98-6 Please refer to Topical Response No. 7.
- L98-7 Please refer to Topical Response No. 4.

**L-99 - Responses to Comments from James Flournoy, Save Our Community SGV, dated November 2, 2017**

- L99-1 The commenter submitted a number of comments, including associated information and attachments. Much of the submitted information and attachments do not include a comment on the MND; where there is a comment, a response is provided. With respect to the other information and attachments, the City appreciates the submission, and as noted in the responses below, this additional submitted information is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

The commenter provides a copy of the 2005 guidance titled "Engineering Geology and Seismology for Public Schools & Hospitals in California". The guidance also applies to "Essential Services Buildings" which are defined as sheriff stations, fire stations, California Highway Patrol communications centers, and Caltrans command-control centers. The Project is not a school, hospital, sheriff station, fire station, California Highway Patrol communications center, or Caltrans command-control center and the commenter's reference to the "Engineering Geology and Seismology for Public Schools & Hospitals in California" is not applicable to the Project; therefore, many of the data requests and

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recommendations throughout this comment letter are also not applicable to this Project.

The commenter provided the name of an individual that did semiology work for the City of Rosemead related to their General Plan and appears to be stating that, as a result of the Biogas Renewable Generation Project, the City should be considering the same studies and updates related to hilltop locations. The Project will be constructed total within the boundaries of the existing Scholl Canyon Landfill which is part of the existing City General Plan. The commenter also recommends several other studies and analysis be performed.

CEQA does not require a lead agency to conduct every test or perform all research, studies, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter would not change the analysis of the Project's environmental impacts in the Draft MND and is not required by CEQA.

The commenter also states that the latest version of the California Building Code (CBC) is the 2017 edition when in fact it is the 2016 edition. The next edition will be in 2019. The CBC 2016 does not reference ASCE 7-16, but references ASCE 7-10. ASCE 7-16 will be adopted as part of the CBC 2019. All facilities at the site will be designed and constructed per the latest edition of the applicable laws, ordinance, regulations, and standards (LORS) in effect at the time of the design and approval for construction.

L99-2      Thank you for supporting the Project. The Project does not include structures for human habitation.

Potential seismic impacts are discussed in the Draft MND Section 3.6. The analysis concluded that no significant seismic impacts would occur from the Project. Please also refer to Topical Response No. 7.

L99-3      The comment is a general statement referring the City to another portion of the commenter's attached document. Please also refer to Topical Response No. 7. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

L99-4      The purposes of the Biogas Renewable Generation project is to combust landfill gas for electrical generation purposes and to comply with local and federal landfill regulations. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

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- L99-5 The commenter's question is unclear as to what the main plant is. The project consists of four reciprocating engines and any of the other engines can be operating when one unit is out of service for maintenance. The comment has been included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-6 No; the engines are not designed to operate on compressed natural gas.
- L99-7 No; the Project is required to run on landfill gas and no more than 10% natural gas.
- L99-8 It is not clear what tanks the commenter is referring to. There are two existing water tanks located west of the Project site that are not part of the Project. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-9 The City disagrees with the comment that mitigation is insufficient. Potential environmental impacts were analyzed consistent with applicable thresholds of significance and requirements of CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 2.
- L99-10 The Landfill Expansion Project and Biogas Renewable Generation Project are separate projects, each with its own independent utility. Please refer to Topical Response No. 1.
- L99-11 Please refer to Topical Response No. 10.
- L99-12 Biogas is a Renewable Energy Portfolio eligible renewable resource (CEC, 2017).<sup>18</sup> Renewable resources include, biogas, solar, wind, geothermal and small hydro. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-13 CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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<sup>18</sup> California Energy Commission, 2017, Renewables Portfolio Standard Eligibility Commission Guidebook Ninth Edition, available at [http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317\\_20170427T142045\\_RPS\\_Eligibility\\_Guidebook\\_Ninth\\_Edition\\_Revised.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-RPS-01/TN217317_20170427T142045_RPS_Eligibility_Guidebook_Ninth_Edition_Revised.pdf)

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Please refer to Topical Response No. 6.

- L99-14 The Project will not use diesel for facility equipment operation. The City conducted an air quality impact analysis for PM<sub>2.5</sub> emissions and concluded that impacts would be less than significant. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Topical Response No. 6.

- L99-15 Please refer to Section 3.3 of the Draft MND and Topical Response No. 6 for a discussion of the Project's potential Air Quality impacts. The City disagrees with the comment that mitigation is required by CARB or as a result of the CEQA analysis. Potential environmental impacts were analyzed consistent with applicable thresholds of significance and requirements of CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-16 Please refer to Topical Response Nos. 2 and 6. The Grayson Repowering Project is not part of the Biogas Renewable Generation Project; each of the projects have their own independent CEQA analysis.
- L99-17 CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-18 Potential air quality impacts, including consideration of Localized Significance Thresholds are discussed in the Draft MND Section 3.3. The air quality impact analysis concluded that no significant air quality impacts would occur from the Project.
- L99-19 The air quality impact analysis of the Project includes impacts from on-site and indirect mobile sources in accordance with SCAQMD policy. The Project is not a proposed land use that would attract a substantial increase in vehicles. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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- L99-20      Thank you for your comment regarding additional sources of information available. The project does not generate significant adverse air quality impacts that would necessitate mitigation measures. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- The project is subject to SCAQMD Rule 403 and construction contractors will comply accordingly. Compliance with all other SCAQMD as applicable will also be maintained.
- L99-21      Greenhouse Gas Emissions are addressed in the IS/MND Section 3.7. Please also refer to Response to Topical Response No. 6. The Project does not result in significant increases in greenhouse gases, and serves as a methane emission control system.
- L99-22      Please refer to Response to Comments No. L99-20.
- L99-23      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. There will be no landscaping as part of the Project.
- All pipelines are being built to code. Condensate is indeed being recycled and the Project does not affect landfill liquids. The Project also does not include landscaping.
- L99-24      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-25      Concrete and asphalt removal and disposal will be conducted in accordance with City of Glendale ordinances and demolition permits. The City anticipates that asphalt will be used for roadways at the landfill. Concrete will be used for on-site road base.
- L99-26      A Geotechnical Investigation Report is provided as Appendix D of the Draft IS/MND. Please refer to Section 2.5.2 of the Draft IS/MND for a discussion on grading that includes estimates for cut and fill volumes. The existing landfill gas

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pipeline from Scholl Canyon Landfill to Grayson Power Plant will be decommissioned in place.

A geotechnical report is attached to the IS/MND as well as a preliminary grading plan. Final grading plans will be developed by the Engineer, Procure, Construct (EPC) Contractor. The existing 5.5-mile-pipeline from Scholl Canyon Landfill to the Grayson Power Plant will not be demolished but will be purging the line with nitrogen and capping each end and abandoned in place.

- L99-27 Please refer to response to Comment No. L99-1.
- L99-28 The Project will be designed in accordance with ASCE7-10 and constructed in accordance with all current code requirements. A lead agency may rely upon a Project's required compliance with building codes and its compliance with recommendations of supporting technical reports to determine that a project will not result in significant impacts.
- L99-29 Thank you for your suggestion and reference to your comments submitted on a separate project.
- L99-30 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft MND. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.
- L99-31 Mr. Fischer is a licensed civil engineer with over 16 years of geotechnical engineering experience. Technical review of the report was provided by Mr. Stone, a Geotechnical Engineer with over 30 years of experience.
- L99-32 The purpose and scope of work for the geotechnical report is summarized in Section 1.2 of Appendix D of the Draft IS/MND. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- The external documents referenced by the commenter are not relevant to the environmental analysis required by CEQA for the Project.
- L99-33 There has been no substantial update to the preliminary grading plans. The additional detailed information requested by the commenter is not required by

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CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project. Final grading plans are the responsibility of the EPC Contractor.

- L99-34 CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Response to Comments No. L99-1.

- L99-35 CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter is not required by CEQA nor would it result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Response to Comments No. L99-1.

- L99-36 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Response to Comments No. L99-1.

- L99-37 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

- L99-38 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

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The Biogas Renewable Generation Project is not in the category of an important structure or is it an essential serviced structure and does not require multi-directional analysis as the commenter is suggesting. Please refer to Response to Comment No. L99-1.

- L99-39 The Project will be constructed in accordance with all current building code requirements. Please refer to Response to Comment No. L99-1. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND.
- L99-40 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L99-41 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project. Highest earthquake magnitude for multi-segment event is listed in the Draft MND geological report.
- L99-42 The Biogas Renewable Generation Project is not an essential service structure. Please refer to Response to Comment No. L99-1.
- L99-43 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-100 - Responses to Comments from Marguerita Drew, dated November 2, 2017**

- L100-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L100-2 Please refer to Topical Response No. 6.
- L100-3 Please refer to Topical Response No. 6.



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- L100-4 Please refer to Topical Response No. 6.
- L100-5 Please refer to Topical Response No. 8.
- L100-6 Please refer to Topical Response Nos. 1, 8, and 9.
- L100-7 Please refer to Topical Response No. 7.
- L100-8 Please refer to Topical Response No. 4.
- L100-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L100-10 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

**L-101 - Responses to Comments from Melodie Khanjian, dated November 2, 2017**

- L101-1 Please refer to Topical Response No. 6.
- L101-2 Please refer to Topical Response No. 6.
- L101-3 Please refer to Topical Response No. 6.
- L101-4 Please refer to Topical Response No. 8.
- L101-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L101-6 Please refer to Topical Response No. 7.
- L101-7 Please refer to Topical Response No. 4.

**L-102 - Responses to Comments from Burt Culver, dated November 3, 2017**

- L102-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance

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with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

- L102-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L102-3 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers in part to the Grayson Repowering Project which is not within the scope of the Project evaluated in the Draft MND. The commenter appears to be recommending the use of fuel cells in place of reciprocating engines for the Project and refers to a 200 kW phosphoric acid fuel cell that Los Angeles Department of Water and Power has installed for a trial project. The commenter refers to such a fuel cell as being capable of running on biogas, however it will not run on landfill gas that is different than biogas from a digester plant. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 2 for additional information.
- L102-4 The commenter proposes that Glendale should look seriously at systems that convert landfill gas into liquid or compressed gas for fueling vehicles. Currently no commercially available technology exists that would convert landfill gas to Liquefied Natural Gas (LNG) that would comply with Department of Energy specification for LNG. The reference provided is for biogas produced from a digester plant and not from a landfill.
- L102-5 Please refer to Response to Comment No. L102-6 regarding Dioxins. Regarding other contaminants in landfill gas. There is a level of treatment that may remove some compounds prior to combustion. Landfill gas is typically treated to remove moisture prior to combustion. Some solid particles and some organic particles may attach to moisture as it is removed from the fuel stream. Additionally, the Project is equipped with a fuel cleanup system to remove siloxanes prior to combustion. These siloxane removal systems can also remove other impurities from the fuel stream. The overall effectiveness of the siloxane removal system relative to other compounds, however, is not known. What is known, however, is that a refined health risk assessment was conducted for the project. The results of that assessment indicate that the project will not lead to a significant health impact.

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- L102-6 The Draft EIR discusses a list of approximately 40 hazardous air pollutants that are expected to occur from the combustion of landfill gas. The list reflects compounds shown to exist based upon past tests of similar operations in California and elsewhere and is utilized by SCAQMD. The list does not include dioxins because, unlike municipal solid waste incineration, test results for Landfill gas combustion have often found dioxins to undetectable, or at trace levels.

To the extent that Dioxins may be result from the combustion of landfill gas, they would generally exist at levels that are similar to what would occur if the landfill gas is incinerated in the existing Scholl Canyon flares. LFG combustion serves as a method of incinerating hazardous compounds that are otherwise present in unburned landfill gas. The benefits of landfill gas combustion are recognized by regulators and the environmental community alike. Both SCAQMD and US EPA enforce regulations to require landfill gas combustion. Additionally, in its 2003 report "Is Landfill Gas Green Energy" the Natural Resource Defense Council (NRDC) concluded that the health risks of landfill gas combustion are 23 times lower than the health risk of unburned landfill gas. NRDC further advised that the most effective way of managing landfill gas is to combust it. NRDC specifically recommended that landfill combustion devices also be capable of generating electricity. The Project goes beyond traditional regulations and NRDC recommendations by not only combusting landfill gas, but also by utilizing post-combustion emission control systems to further reduce residual hazardous air pollutants. Until recently, these post-combustion emission control systems were not considered to be technologically viable in landfill applications.

- L102-7 The Project would emit 0.44 pounds of mercury per year when operated at 100% load. The health risk assessment for the Project demonstrates that the total potential hazardous pollutants do not lead to health impacts that are considered to be significant by South Coast AQMD or the California Office of Environmental Health Hazard Assessment.

- L102-8 The Project is equipped with emissions control systems that are considered by SCAQMD to be Toxics Best Available Control Technology (TBACT). The designation of TBACT reflects the most effective emissions control system that is available and technologically feasible for a source of hazardous air toxics emissions, regardless of economic cost.

**L-103 - Responses to Comments from Michelle Gunn, dated November 3, 2017**

- L103-1 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to "the planned Grayson expansion project at Scholl Canyon." The commenter's statement is included in the Final MND for the

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decision-maker's consideration as part of the City's deliberations on the Project.  
Please also refer to Topical Response Nos. 1, 2, and 6.

L103-2 Please refer to Topical Response No. 10.

**L-104 - Responses to Comments from Burt Culver, dated November 5, 2017**

L104-1 The commenter is correct that the Biogas Renewable Generation Project is incorrectly referenced in the Grayson Repowering Project Draft EIR Section 6.1.3, Precedent-Setting Action. The inadvertent inclusion of the Biogas Renewable Generation Project will be corrected in the Grayson Repowering Project Final EIR.

The commenter is correct that combustion of biogas is incorrectly referenced in the Grayson Repowering Project Draft EIR Section 6.2, Significant Irreversible Environmental Changes. This inadvertent reference will be corrected in the Grayson Repowering Project Final EIR.

The commenter is correct that use of biogas is incorrectly referenced in Draft EIR Section 6.2.1, Irreversible Commitment of Resources. This inadvertent reference will be corrected in the Grayson Repowering Project Final EIR.

Please also refer to Topical Response No. 2.

L104-2 This comment claims that the Grayson Repowering Project should not be able to use the burning of biogas as part of its base emissions profile because the biogas will be combusted elsewhere. Consideration of existing biogas combustion when determining criteria pollutant baseline emissions for the Grayson Repower project is appropriate given the nature of the Project and reflects SCAQMD regulations and guidance.

Please also refer to Topical Response No. 2.

L104-3 The Biogas Renewable Generation Project and the Grayson Repowering Project are separate projects. Reference within the Grayson Repowering Project Draft EIR to the decommissioning of the pipe associated with the separate Biogas Renewable Generation Project does not require that the projects be considered together in one EIR.

Please also refer to Topical Response Nos. 2 and 3.

L104-4 Please refer to Response to Comment No. L104-3

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- L104-5 The commenter expresses an opinion regarding the Grayson Repower Project that is not relevant to the Biogas Renewable Generation Project. Please refer to Topical Response No. 2.
- L104-6 Please refer to Response to Comment No. L104-5.
- L104-7 Please refer to Response to Comment No. L104-5.
- L104-8 Please refer to Topical Response Nos. 2, 3, and 4 and Response to Comment No. L23.
- L104-9 This is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 2.

**L-105 - Responses to Comments from James Flournoy of Save Our Community SGV, dated November 6, 2017**

- L105-1 The commenter submitted a number of comments, including associated information and attachments. Much of the submitted information and attachments do not include a comment on the MND; where there is a comment, a response is provided. With respect to the other information and attachments, the City appreciates the submission, and as noted in the responses below, this additional submitted information is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L105-2 The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L105-3 The commenter provides a copy of the 2005 guidance titled "Engineering Geology and Seismology for Public Schools & Hospitals in California". The guidance also applies to "Essential Services Buildings" which are defined as sheriff stations, fire stations, California Highway Patrol communications centers, and Caltrans command-control centers. The Project is not a school, hospital, sheriff station, fire station, California Highway Patrol communications center, or Caltrans command-control center and the commenter's reference to the "Engineering Geology and Seismology for Public Schools & Hospitals in California" is not applicable to the Project; therefore, many of the data requests and recommendations throughout this comment letter are also not applicable to this Project. The Project will be constructed in accordance with all current code requirements.

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- L105-4 The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L105-5 Thank you for the information on ARkStorm; which is a document that summarizes the environmental effects, physical damages, economic and other losses in California as a result of the hypothetical flooding and high winds associated with the ARkStorm scenario. The additional information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.
- L105-6 The Project will be designed in accordance with ASCE7-10 and the latest edition of the CBC. The major equipment will be placed on a non-fill portion of the landfill. A lead agency may rely upon a Project's required compliance with building codes and its compliance with recommendations of supporting technical reports to determine that a project will not result in significant impacts.
- L105-7 The Project will be constructed in accordance with all current code requirements. The additional information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.
- L105-8 Thank you for the information. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. The Project will be constructed in accordance with all current building code requirements. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND.
- L105-9 The Project will be constructed in accordance with all current code requirements, including current requirements for aboveground storage tanks. Please refer to Topical Response No. 8.
- L105-10 Thank you for the information. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. The Project will be constructed in accordance with all current building code requirements. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND.
- L105-11 Thank you for the information. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on

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the Project. The Project will be constructed in accordance with all current building code requirements. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND.

**L-106 - Responses to Comments from Randall Wise, dated November 6, 2017**

- L106-1 Please refer to Topical Response Nos. 2, 3, and 4. The Project is not being used to offset the emissions from the proposed Grayson Repowering Project.
- L106-2 Please refer to Topical Response No. 3.

**L-107 - Responses to Comments from Amy Minter, Attorney for Glenoaks Canyon Homeowners Association (GOCHA), dated November 7, 2017**

- L107-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment correctly states that the Biogas Renewable Generation Project would use methane (landfill gas) to generate power and that the landfill gas is currently "processed" at the Grayson Power Plant. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer
- L107-2 The comment is an opinion that the Project would violate CEQA because the MND is inadequate and inaccurate; that an EIR should be prepared. The commenter cites to the California Public Resources Code §21151 which sets forth the "fair argument" standard for determining when an EIR should be prepared and the commenter cites to various court cases that discuss the "fair argument" standard. This comment does not provide any evidence to support the opinion that an EIR should be prepared for the Project. Please refer to Topical Response No. 3.
- L107-3 The comment cites to various court cases that discuss the information to be included in an initial study and MND. The comment refers to the October 19, 2017 letter from the Glenoaks Canyon HOA that allegedly documents information failures in the MND (Please refer to Response to Comment No. L26 (October 18, 2017 letter from GOCHA). Further, the comment states that the MND also fails to address the "reasonably foreseeable consequences of the Biogas Renewable Generation Project and the cumulative air quality impacts." The comment does not describe what reasonably foreseeable consequence of the Project has not been addressed in the MND. Please refer to Topical Response Nos. 2, 4 and 6.
- L107-4 The comment states that the Biogas Renewable Generation Project would rely on landfill gas generated by the Scholl Canyon Landfill to generate electricity. This is

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an accurate statement. The commenter then concludes that the continued operation of the Scholl Canyon Landfill is necessary for the Biogas Renewable Generation Project. This comment is a conclusion unsupported by facts. Nowhere in the MND or in any other document, study, public presentation, or anywhere is the continued operation of the Scholl Canyon Landfill a prerequisite to the Biogas Renewable Generation Project. The Biogas Renewable Generation Project has independent utility from any future potential expansion of Scholl Canyon Landfill. The possible of an anaerobic digester project was examined in the MND. Please refer to Topical Response Nos. 1, 2 and 4.

- L107-5 Please refer to Topical Response Nos. 1, 2, 4 and 6.
- L107-6 Please refer to Response to Comment No. L107-5. Please also refer to Topical Response Nos. 2, 4 and 6.
- L107-7 Please refer to Response to Comment No. L107-5. Please also refer to Topical Response Nos. 2, 4 and 6.

**L-108 - Responses to Comments from James Flournoy of Save Our Community SGV, dated November 8, 2017**

- L108-1 The comments attached to the email received on November 8, 2017, have been included in the Final MND.
- L108-2 The comments attached to the email received on November 6, 2017, have been included in the Final MND.
- L108-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L108-4 The commenter provided the name of an individual that did semiology work for the City of Rosemead related to their General Plan and appears to be stating that, as a result of the Biogas Renewable Generation Project, the City should be considering the same studies and updates related to hilltop locations. The Project will be constructed total within the boundaries of the existing Scholl Canyon Landfill which is part of the existing City General Plan. The commenter also recommends several other studies and analysis be performed.

CEQA does not require a lead agency to conduct every test or perform all research, studies, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter



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would not change the analysis of the Project's environmental impacts in the Draft MND and is not required by CEQA.

Commenter also states that the latest version of the California Building Code (CBC) is the 2017 edition when in fact it is the 2016 edition. The next edition will be in 2019. The CBC 2016 does not reference ASCE 7-16, but references ASCE 7-10. ASCE 7-16 will be adopted as part of the CBC 2019. All facilities at the site will be designed and constructed per the latest edition of the applicable laws, ordinance, regulations, and standards (LORS) in effect at the time of the design and approval for construction.

- L108-5 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L108-6 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L108-7 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft IS/MND. The commenter's statement is included in the Final IS/MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L108-8 Thank you for your comment regarding additional sources of information available. The information noted does not result in changing conclusions reached in the Draft MND. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-109 - Responses to Comments from Jose Huizar, Council Member, City of Los Angeles 14th District, dated November 8, 2017**

- L109-1 Thank you for your comments. They have been included in the Final MND.
- L109-2 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L109-3 The potential environmental impacts of the Project are analyzed in the Draft MND. The Draft MND demonstrates that the Project would not result in any unmitigable significant impacts. Please refer to Topical Response Nos. 1, 2, 3, 5, 6, and 8.

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- L109-4 The City disagrees with the comment that the City did not consider the interests of the Eagle Rock community. Potential environmental impacts of the Project, including, but not limited to those that could occur in Eagle Rock are analyzed in the Draft MND. Additionally, the City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L109-5 Please refer to Topical Response Nos. 1 and 10.
- L109-6 Please refer to Response to Comments No. L116 and Topical Response No. 10.
- L109-7 Please refer to Topical Response No. 10.
- L109-8 Please refer to Topical Response No. 10.
- L109-9 Please refer to Topical Response Nos. 3 and 10.
- L109-10 Please refer to Topical Response No. 3.
- L109-11 Please refer to Topical Response Nos. 1 and 2.
- L109-12 Please refer to Topical Response No. 4.
- L109-13 The incorrect reference of the Biogas Renewable Generation Project as the Landfill Expansion Project has been corrected in the attached errata. Please refer to Topical Response No. 1.
- L109-14 Cumulative impacts regarding biological resources and stormwater drainage are found in the MND Section 3.19 Mandatory Findings of Significance. Please refer to Topical Response Nos. 1 and 4.
- L109-15 Please refer to Topical Response Nos. 4 and 6.
- L109-16 Please refer to Topical Response No. 2.
- L109-17 Please refer to Topical Response Nos. 2, 3, 4, 5, 6, and 9.
- L109-18 Please refer to Topical Response Nos. 2, 3, 4, and 6.
- L109-19 Greenhouse gas emissions have global, rather than local impacts. The project neither increases, nor decreases the amount of landfill gas being generated at the Scholl Canyon Landfill. Landfill gas that will be combusted in the Project is currently being combusted at Grayson Power Plant. With the retention of gas at Scholl Canyon, the increase in emissions at the Biogas Renewable Generation Project will be directly balanced by a proportional and direct reduction in

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greenhouse gas emissions from the Grayson plant. Please also refer to Topical Response No 6.

- L109-20 Greenhouse gas emissions from Scholl should not be included in the emission baseline for Grayson. Doing so would understate the emissions increase at Grayson. Please also refer to Topical Response No. 6 and response to comment L109-19.
- L109-21 Today, only greenhouse gas emissions from natural gas combustion at Grayson are offset through the Cap and Trade Program. The Cap and Trade Program has no direct impact on greenhouse gas emissions from either Grayson or the Biogas Renewable Generation project. Landfill gas combustion emissions are not offset under California regulations because they are required to be combusted by local and federal regulations and the combustion of landfill gas results in environmental benefits. Transferring the combustion to the Biogas Renewable Generation project does not result in an emission increase above those emissions that exist today from landfill gas combustion and the increase in emissions from the Biogas Renewable Generation Project is appropriately measured against the baseline landfill gas emissions that currently result at Grayson. Please also refer to Topical Response No. 6.
- L109-22 The project does not result in a net increase in emissions because it directly replaces existing combustion of the same landfill gas from Scholl Canyon Landfill. Please also refer to Topical Response No. 6 and Response to Comment Nos. L109-19 through L109-22.
- L109-23 GHG emissions from combustion is dependent on the quantity and the type of fuel being combusted, but it is not dependent on the combustion technology. In other words, GHG emissions from engines or flares is expected to be the same as long as the quantity and type of fuel combusted are identical. The quantity of landfill gas combusted in the flare system during project construction and in the engines once the power plant is operating is expected to be identical. The following table illustrates the annual GHG emissions from landfill combustion during and after project construction.

\*During power plant operation, landfill gas will be combusted in the flare system only during engine maintenance or breakdown.

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	0 – 12 months (Construction)	13 – 24 months (Construction and Operation)	25 – 36 months (Operation)	37 – 48 months (Operation)
Quantity of LFG combusted, MMBtu/year	833,444	833,444	833,444	833,444
Combustion Technology	Flares	Engines and Flares	Engines*	Engines*
Estimated GHG Emission (CO <sub>2</sub> e), MT/year	43,621	43,621	43,621	43,621

\*During power plant operation, landfill gas will be combusted in the flare system only during engine maintenance or breakdown.

As shown in the above table, because the net increase of GHG emissions of the Project is based upon the total amount of landfill gas that is available and is not dependent upon combustion technology, the transition between flares and internal combustion engines does not present an emission increase or any emissions that are not accounted for in the DEIR.

L109-24 The statement on page 3.19.4 noted by the commenter is incorrect. The text on Page 3.19.4 has been corrected in the Final MND errata, to state that there would be an increase in greenhouse gas emissions that is below a level of significance. There is a similar accurate statement on Page 3.7.4 in the Greenhouse Gases section of the Draft IS/MND which accurately states "As shown in Table 3.7-2 and 3.7-3, the net increase of GHG emissions from the Proposed Project is below the significance threshold of 10,000 metric tons per year.

L109-25 Occupancy accounts for 52 MT of the increase and construction activities account for 258 MT of the increase. The remaining 4,496 MT increase reflects differences in projected peak Scholl Canyon Landfill gas production, versus previously reported production rates in 2015 and 2016. However, landfill gas production is not dictated by either the Biogas Renewable Generation Project or the Grayson Power Plant. Any increases or decreases in landfill gas production that would affect Grayson under existing operations, would have an equal impact on the Biogas Renewable Generation Project. Even with the differences in projected gas production, the entire net increase of 4,808 MT is below the SCAQMD significance threshold of 10,000 MT.

The statement on page 3.7.4 has been revised to specify that the increase includes not only occupancy effects, but also construction effects. It also discusses the implications of gas production rates on the net increase.

L109-26 Emission offset or emission reduction credits are part of SCAQMD regulatory New Source Review (NSR) program requirement, in addition to Best Available Control Technology (BACT) and Ambient Air Quality Impact Analysis (AQIA). The Biogas

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Renewable Generation Project must comply with all applicable regulations before SCAQMD can issue construction and operating permits. Because The Project is required to comply with these regulations, such compliance may be considered part of the Project and need not be separately imposed as mitigation. Therefore, net emissions after the application of emission offsets or emission reduction credits should be included in determining the significance levels of air quality impact.

- L109-27 In accordance to the CEQA Air Quality Handbook prepared by SCAQMD, chapter 9.4: Guidance for Assessing Carbon Monoxide Emission, the appropriate methodology for assessing CO emissions and determining local and regional impacts is to conduct ambient air quality impact analysis. An air quality analysis is also the correct method of determining significance of PM2.5 emissions.

The result of air dispersion model for the Biogas Renewable Generation Project shows that ambient concentrations of CO and PM2.5 levels resulting from the project are below the CEQA significance thresholds that SCAQMD has identified.

- L109-28 Please refer to Response to Comment L109-27.

The estimated daily PM2.5 emission from the Project operation is only three pounds above the daily mass emission significance thresholds. The allocated emission reduction credits to offset PM10 from the Project will also offset large amount of PM2.5 because the majority of emission reductions used to generate PM10 offsets also include PM2.5 reductions. Therefore, with the emission reduction credits, PM2.5 daily emission is expected to be below the significance threshold. More importantly, air dispersion modeling for PM2.5 was conducted to determine the localized air quality impact of the Project. The model shows that ambient PM2.5 concentrations will be below the ambient air quality standard, and therefore below a level of significance.

- L109-29 As shown in the MND, daily VOC emissions as permitted by SCAQMD will be below a level of significance. Net emission increases of NOX, VOC, PM10 and SOX are below daily mass levels that are considered significant by SCAQMD. Additionally, it is appropriate to determine the significance of project impacts based upon the results of dispersion models and an air quality impact analysis. The models show the air quality impact to surrounding receptors by estimating the concentration of the pollutants as being dispersed through the air. The results of the air dispersion model for the Biogas Renewable Generation Project indicates that localized air quality impacts of NOX, PM10 and SOX are below significance thresholds. Therefore, there no mitigation is required for these pollutants.

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Because there is no ambient air quality standard for VOC, the level of significance for VOC can only be determined by comparing emissions with the daily mass emission threshold. As shown in the MND, daily VOC emissions as permitted by SCAQMD will be below a level of significance. Mitigation is not required. Additionally, the engineers are indeed equipment with state of the art emission controls which reduces CO, VOC, and organic hazard compounds. This technology meets the SCAQMD BACT as well as the Toxic BACT.

- L109-30 Please refer to Topical Response No. 6.
- L109-31 Please refer to Topical Response Nos. 2 and 6.
- L109-32 Please refer to Topical Response Nos. 2 and 6.
- L109-33 Please refer to Topical Response Nos. 2 and 3.
- L109-34 Please refer to MND Sections 2.3 Project Elements and Section 3.3 Air Quality for equipment selection information.
- L109-35 Please refer to MND Sections 2.3 Project Elements and Section 3.3 Air Quality for equipment selection information. Please refer to Topical Response Nos. 2 and 3.
- L109-36 CEQA does not require a lead agency to perform all research and study recommended or demanded by commenters. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 3.
- L109-37 CEQA does not require a lead agency to perform all research and study recommended or demanded by commenters. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 3 and 4.
- L109-38 CEQA does not require a lead agency to perform all research and study recommended or demanded by commenters. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 3.
- L109-39 Please refer to Topical Response Nos. 2 and 6.
- L109-40 Please refer to Topical Response Nos. 2 and 6.
- L109-41 Cumulative noise impacts were analyzed and appropriately determined to be less than significant in the Draft MND. The Biogas Renewable Generation Project

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would have a minor increase in traffic compared to the Project and would therefore not produce a substantial contribution of traffic related noise impacts to sensitive receptors. Please also refer to Topical Response No. 4.

- L109-42 Cumulative noise impacts were analyzed and appropriately determined to be less than significant in the Draft MND. Please also refer to Topical Response No. 4.
- L109-43 Project-specific ambient noise measurements were collected at sensitive receptors nearest and most representative of those with the highest potential to be impacted by Project noise. Please also refer to Topical Response Nos. 1, 4, and 9.
- L109-44 Please refer to Topical Response Nos. 1, 3, 4, and 9.
- L109-45 Please refer to Topical Response Nos. 3 and 4.
- L109-46 Please refer to Topical Response No. 1, 3, 4, and 9.
- L109-47 Please refer to Topical Response No. 5.
- L109-48 Please refer to Topical Response No. 5.
- L109-49 The additional information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND and is not required by CEQA. Please also refer to Topical Response No. 5.
- L109-50 CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft MND and is not required by CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.
- L109-51 Please refer to Topical Response No. 5.
- L109-52 Please refer to Topical Response No. 5.
- L109-53 The location of the nearest school has been corrected in the attached errata. The reference to the nearest school noted by the commenter is in reference to whether the Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. With the above noted correction, PUC Cals, Eagle Rock Montessori School, and Dahlia Heights Elementary are approximately one

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mile from the Project site. The environmental impact analysis in the Draft MND that the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school is accurate and there would be no impact, even with the above noted correction.

- L109-54 Please refer to Response to Comment No. L109-53.
- L109-55 The incorrect reference to the nearest elderly care facility in the Hazards and Hazardous Materials section of the Draft MND has been corrected in the Final MND errata. This correction does not result in any changes to potential hazards and hazardous materials impacts of the Project as evaluated in the Draft MND.
- L109-56 The summary of surrounding communities provided in Section 3.13.1 of the Draft MND is intended to provide setting in support of evaluating potential population and housing impacts of the Project. Specific inclusion of the residents on the 7600 block of North Figueroa Street in the subject setting summary of population and housing would not change the impact analysis or conclusion in the Draft MND that the Project would have no impact on population and housing. The commenter further asserts that this omission in the Population and Housing section of the Draft MND affects the traffic impact analysis of the Project on North Figueroa Street. An analysis of potential traffic impacts of the Project, which includes North Figueroa Street, is included in Section 3.16 of the Draft MND. This analysis demonstrates potential traffic impacts of the Project would be less than significant. Please also refer to Topical Response No. 9.
- L109-57 Please refer to Response to Comments Nos. L109-53 through L109-56 and Topical Response Nos. 3 and 10.
- L109-58 Thank you for the information that the Eagle Rock Monument and Eagle Rock Recreation Center, which are Historic Cultural Monuments, are located near the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L109-59 The Eagle Rock Monument and Eagle Rock Recreation Center are located approximately  $\frac{3}{4}$  mile south of the Project site. These receptors are farther away from the Project than receptors used in the Draft MND to analyze potential worst-case air quality and noise impacts. Please refer to Topical Response No. 5 for a discussion on aesthetics and Topical Response No. 6 for a discussion on air quality. The Draft MND's conclusions that the Project would not result in unmitigable significant impacts to air quality, noise, visual, and cumulative impacts remain accurate in consideration of the comment.



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- L109-60 The reference to 1.66 acres as the area of effective facility expansion in Section 3.18 of the Draft MND is incorrect. The area of effective facility expansion of 1.73 acres is correctly listed in Table 2.3-1 and Section 2.5.2 of the Draft MND. This inconsistency has been corrected in the attached errata. The reference to 0.33 acres of existing equipment has also been removed from the discussion. The incremental difference between 1.66 acres evaluated in the Draft MND and the corrected area of 1.73 acres would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects beyond that evaluated in the Draft MND. These revisions to the Draft MND would not result in any new environmental impacts, substantially increase the magnitude of any environmental impacts or require any new mitigation measures. Potential Utilities and Services Systems impacts would remain less than significant.
- L109-61 Please refer to Response to Comment No. L109-60. Potential impacts to native habitat and required mitigation measures are presented in Section 3.4 of the Draft MND.
- L109-62 The existing landfill stormwater drainage system is designed to handle stormwater from the entire landfill site. The Biogas Renewable Generation Project is located entirely within a non-filled portion of the landfill site; therefore, the existing landfill stormwater system is designed and is capable of handling the stormwater from the Project. During construction, stormwater will be temporary detained on the site via the structures stated. When construction is completed, these and other structures will be made permanent such that completed stormwater system will be functional prior to engine startup.
- L109-63 The comment notes that the Project site is located in a Very High Fire Hazard Zone. The potential environmental impacts analyzed in the Draft MND consider this designation. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 8.
- L109-64 The commenter asserts that in addition to the City of Glendale, the City of Los Angeles Fire Department could also be a first responder to a large-scale event at the Project site. The availability of additional potential first responders would not change the conclusion in the MND that the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire department facilities, need for new or physically altered fire department facilities, the construction of which could cause significant environmental impact. Please also refer to Topical Response No. 8.
- L109-65 Please refer to Topical Response No. 8.

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- L109-66 Please refer to Topical Response No. 8.
- L109-67 Please refer to Topical Response Nos. 3, 8, and 10.
- L109-68 The mitigation measures identified for biological resources are effective in reducing potential biological resources impacts to less than significant. Please also refer to Topical Response Nos. 1 and 4.
- L109-69 Please refer to Response to Comment No. L109-68.
- L109-70 Please refer to Response to Comment No. L109-68 and Topical Response No. 3.
- L109-71 The City disagrees with the comment that mitigation is insufficient and unenforceable. Potential environmental impacts were analyzed consistent with applicable thresholds of significance and requirements of CEQA and mitigation measures will be incorporated as conditions of approval for the Project. The MMRP would state the Monitoring Action, Required Time of Compliance, Implementation Responsibility, Verification Responsibility, Verification Method and a Compliance Date to insure enforceability. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L109-72 The comment is a general statement about the commenter's opinion that the City of Los Angeles and Eagle Rock bear the burden of environmental impacts from the Scholl Canyon Landfill and that the City of Glendale reaps the economic benefit. The commenter also asserts that the Draft MND did not consider areas of Los Angeles. The City disagrees with the comment and the Draft MND did evaluate receptors in Los Angeles. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.
- L109-73 Please refer to Response to Comment No. L109-71 and Topical Response Nos. 1, 3, and 4.
- L109-74 Please refer to Topical Response No. 1.
- L109-75 Please refer to Response to Comment No. L109-71, and Topical Response No. 9. No additional mitigation is required.
- L109-76 Please refer to Response to Comment No. L109-71 and Topical Response No. 1. The Project does not increase waste hauling truck use of Los Angeles streets. No additional mitigation is required.
- L109-77 Please refer to Response to Comment No. L109-76 and Topical Response No. 1.

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- L109-78 Please refer to Response to Comment No. L109-76 and Topical Response No. 1.
- L109-79 The mitigation measures identified for biological resources are effective in reducing potential biological resources impacts to less than significant. No additional mitigation is required. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L109-80 The Project would not result in potentially significant impacts to recreation and no mitigation is therefore required. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L109-81 The comment is a general statement about the commenter's opinion that the City of Los Angeles bears the burden of environmental impacts from the Scholl Canyon Landfill. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L109-82 Please refer to Response to Comment No. L109-71 and Topical Response Nos. 1, 3, and 4.
- L109-83 Please refer to Response to Comment No. L109-71 and Topical Response Nos. 1, 2, 3, 4, 5, 6, 8, 9, and 10.
- L109-84 Please refer to Topical Response No. 3.

**L-110 - Responses to Comments from Mike Smithson, dated November 8, 2017**

- L110-1 Please refer to Topical Response No. 6.
- L110-2 Please refer to Topical Response No. 6.
- L110-3 Please refer to Topical Response No. 6.
- L110-4 Please refer to Topical Response No. 8.
- L110-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L110-6 Please refer to Topical Response No. 7.
- L110-7 Please refer to Topical Response No. 4.

**L-111 - Responses to Comments from Arin Rao, dated November 9, 2017**

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- L111-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 6.
- L111-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-112 - Responses to Comments from Ashfaq Chowdhury, dated November 9, 2017**

- L112-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L112-2 Air quality impacts are discussed in Section 3.3 of the Draft MND. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- L112-3 Safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L112-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L112-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. The MND has not identified any significant impacts. The Project does not generate, store or convert methane. Please refer to Topical Response No. 1 and 2.

**L-113 - Responses to Comments from Audry Zarokian, dated November 9, 2017**

- L113-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance

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with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 4.

- L113-2 Please refer to Topical Response No. 6.
- L113-3 Please refer to Topical Response No. 6.
- L113-4 Please refer to Topical Response No. 6.
- L113-5 Please refer to Topical Response No. 8.
- L113-6 Please refer to Topical Response Nos. 1, 8, and 9.
- L113-7 Please refer to Topical Response No. 7.
- L113-8 Please refer to Topical Response No. 4.
- L113-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 4.

**L-114 - Responses to Comments from Barrett Cooke, dated November 9, 2017**

- L114-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L114-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 8.

**L-115 - Responses to Comments from Carrie Hansen, dated November 9, 2017**

- L115-1 The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. The comment refers to the Scholl Canyon Landfill Expansion Project that is

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being evaluated under a separate CEQA process. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1, 3, and 4.

**L-116 - Responses to Comments from Mark Pestrella and Phil K. Doudar, County of Los Angeles  
Department of Public Works, dated November 9, 2017**

- L116-1 Thank you for your letter dated November 9, 2017. Comments provided by the County of Los Angeles are included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L116-2 The comment is a general statement about the background of the Project and the Scholl Canyon Landfill. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The City concurs with the Project summary provided in the comment.
- L116-3 Stantec to Address – Les
- L116-4 We will purge the pipeline with nitrogen and burn any landfill gas within the pipeline, so no orders will occur.
- L116-5 The noise receptors locations were selected based on the nearest distance of each sensitive receptor to the Project site.
- L116-6 The locations selected for collecting ambient noise measurements to determine representative existing noise levels were based on the nearest location of sensitive residential land uses in closest proximity to the Project. These residential land uses would have the greatest potential to be impacted by Project noise and are most appropriate for evaluating potential worst-case operational noise impacts of the Project on surrounding sensitive receptors. The City concurs with the commenter that ambient noise levels at sensitive receptor R2 which is located south of State Highway 134 were the highest of the six locations measured. In fact, the existing day (65.2 bBA) and night time (64.3 dBA) noise levels at sensitive receptor R2 already exceed the City's presumed noise standard of 45 dBA during nighttime or 55 dBA during daytime. The City's noise ordinance addresses situations where the actual ambient noise level is more than the presumed ambient noise level. In these situations, the ambient noise level used in Project impact analysis cannot be greater than 5 dBA over the presumed ambient noise levels even if actual ambient noise levels are higher. This requirement of the City's noise ordinance provides additional assurance that substantial noise increases in areas already subject to high ambient noise levels are not significantly

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exacerbated. In the case of sensitive receptor R2, the Project noise impact analysis assumed day and night time ambient noise levels of 60 and 50 dBA.

As shown in Table 3.12-3 of the Draft IS/MND, the nearest residential receptors are in excess of 2,000 feet from the Project site. Table 3.12-5 of the Draft IS/MND shows the resulting Project operation noise level at each of the six representative sensitive receptors. As shown in Table 3.12-5, Project operation noise ranges from 29.9 dBA to 40.6 dBA at each sensitive receptor. The greatest increase in existing noise levels was predicted to be a 1.5 dBA increase during the night time at sensitive receptor R5, far below the City's allowable increase of 5 dBA in the City noise ordinance used for purposes of the Project's noise impact analysis. City of Glendale's noise ordinance requires equal or more stringent noise limitations than those established by adjacent municipalities with sensitive receptors that could be affected and is therefore appropriate for the Project's conservative noise impact analysis included in the Draft IS/MND.

Actual ambient noise measurements collected at the six representative sensitive noise receptors ranged between 37.1 dBA and 65.2 dBA during the day and between 39.1 dBA and 64.3 dBA during the night time. Despite these wide variations in ambient noise levels, the noise modeling conducted to analyze the Project's potential noise impacts demonstrates as shown in Table 3.12-5 that the Project would not result in a substantial increase in noise levels at any of the sensitive receptors analyzed. The less than significant incremental increase in noise levels predicted at each sensitive receptor would be representative of all nearby sensitive receptors regardless of variations in ambient noise levels between sensitive receptors.

- L116-7 Noise impact thresholds are the City's noise ordinance thresholds that have been adopted and used.
- L116-8 Please refer to Topical Responses No. 4 and 9.
- L116-9 Potential impacts of construction-related activities were assessed using SCAQMD daily emission significance thresholds as well as SCAQMD Localized Significance Impact Thresholds for criteria pollutants. Please refer to Section 3.7 of the Draft MND.

GHG emissions during construction operations are the result of fuel combustion in construction equipment. While the level of emissions does not require mitigation measures, greenhouse gas emissions, including CO<sub>2</sub> and CH<sub>4</sub> emissions are controlled primarily through the use of construction equipment that includes newer high-efficiency internal combustion engines.

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- L116-10 If the City has any questions regarding the County of Los Angeles, Department of Public Works letter, we will contact Mr. Martin Aiyetiwa of Environmental Programs Division, Landfill Section.

**L-117 - Responses to Comments from Emily Simon, dated November 9, 2017**

- L117-1 Please also refer to Topical Response Nos. 1, 6, and 8.

**L-118 - Responses to Comments from Eagle Rock Neighborhood Council, dated November 9, 2017**

- L118-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 3, and 10.
- L118-2 The City has complied with all noticing regarding the Project required by CEQA Guidelines at Section 15072. Please also refer to Topical Response No. 10.
- L118-3 The evaluation of environmental factors in the Draft MND considered the area surrounding the Scholl Canyon Landfill that could be impacted by the Project. The analysis of each environmental factor considered the extent to which impacts could reasonably be determined to occur including offsite locations. No arbitrary City, County, or community boundary was applied that limited the evaluation of environmental impacts.
- L118-4 Please refer to Section 3.12 of the Draft MND where it concludes that noise impacts of the Project are less than significant. Please refer to Topical Response Nos. 5 and 9.
- L118-5 Please refer to Topical Response Nos. 3, and 10.
- L118-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L118-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the



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decision-maker's consideration as part of the City's deliberations on the Project.  
Please also refer to Topical Response No. 1.

**L-119 - Responses to Comments from Frankie Norstad, dated November 9, 2017**

- L119-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 3/7 of the Draft MND, which demonstrates that GHG emission from the Project would be less than significant. Please also refer to Topical Response Nos. 1, 6, and 8.

**L-120 - Responses to Comments from The Eagle Rock Association, dated November 9, 2017**

- L120-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.
- L120-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.
- L120-3 Potential air quality impacts are discussed in Section 3.3 of the Draft MND. The analysis concluded that no significant air quality impacts would occur from the Project. Please also refer to Topical Response No. 6.
- L120-4 Potential water quality impacts are discussed in Section 3.9 of the Draft MND. The analysis concluded that no significant water quality impacts would occur from the Project.
- L120-5 Potential noise impacts are discussed in Section 3.12 of the Draft MND. The analysis concluded that no significant noise impacts would occur from the Project. Please also refer to Topical Response No. 9.

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- L120-6 Potential traffic impacts are discussed in Section 3.16 of the Draft MND. The analysis concluded that no significant impacts would occur to traffic or transportation from the Project. Please also refer to Topical Response No. 9.
- L120-7 Potential fire safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant fire safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L120-8 Potential aesthetics impacts are discussed in Section 3.1 of the Draft MND. The analysis concluded that no significant aesthetics impacts would occur from the Project. Please also refer to Topical Response No. 5.
- L120-9 Please refer to Topical Response Nos. 2 and 3.
- L120-10 Please refer to Topical Response No. 1.
- L120-11 Please refer to Topical Response No. 3.

**L-121 - Responses to Comments from Hans Johnson of Communities United, dated November 9, 2017**

- L121-1 Thank you for your comment regarding transmittal of comment letter L18 from Communities United, dated October 17, 2017. Please refer to Response to Comment No. L18.
- L121-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L121-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 3 and 4.
- L121-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1, 6, and 8.

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- L121-5      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-122- Responses to Comments from Hans Johnson of Communities United, dated November 9, 2017**

- L122-1      Thank you for your comment regarding transmittal of Comment Letter L18 from Communities United, dated October 17, 2017. Please refer to Response to Comment Letter L18.

**L-123 - Responses to Comments from Jane Potelle, dated November 9, 2017**

- L123-1      The Project evaluated in the Draft MND is the Biogas Renewable Generation Project. Some of the comments refer to the Scholl Canyon Landfill Expansion Project and the Grayson Repowering Project both of which are being evaluated under a separate CEQA process. With regards to the comment where the commenter also expresses concern over increased emissions from the Project, the commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1, 2, and 6.

**L-124 - Responses to Comments from John Nugent, dated November 9, 2017**

- L124-1      Please refer to Topical Response No. 10.

**L-125 - Responses to Comments from Linda Johnstone Allen, dated November 9, 2017**

- L125-1      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to TR. 1.
- L125-2      The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 1.

**BIOGAS RENEWABLE GENERATION PROJECT**  
**FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**

RESPONSE TO COMMENTS  
March 9, 2018

- L125-3 Potential safety impacts are discussed in Section 3.8 of the Draft MND. The analysis concluded that no significant safety impacts would occur from the Project. Please also refer to Topical Response No. 8.
- L125-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 10.
- L125-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 3.
- L125-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response Nos. 1 and 10.

**L-126 - Responses to Comments from Meldia Yesayan, dated November 9, 2017**

- L126-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.
- L126-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 6.
- L126-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance

**BIOGAS RENEWABLE GENERATION PROJECT  
FINAL INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**

RESPONSE TO COMMENTS  
March 9, 2018

with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 3.

**L-127 - Responses to Comments from Seth Cutler, dated November 9, 2017**

- L127-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project.

**L-128 - Responses to Comments from Teri Stein, dated November 9, 2017**

- L128-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final MND and compliance with CEQA. The commenter's statement is included in the Final MND for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 6.
- L128-2 Please refer to Topical Response Nos. 1 and 6.

**L-129 - Responses to Comments from Bethsaida Emilia Castillo**

- L129-1 Please refer to Topical Response No. 6.
- L129-2 Please refer to Topical Response No. 6.
- L129-3 Please refer to Topical Response No. 6.
- L129-4 Please refer to Topical Response No. 8.
- L129-5 Please refer to Topical Response Nos. 1, 8, and 9.
- L129-6 Please refer to Topical Response No. 7.
- L129-7 Please refer to Topical Response No. 4.

**From:** [Jack Cheng](#)  
**To:** [Joe, Dennis](#)  
**Subject:** RE: Scholl Canyon Landfill Biogas Renewable Generation Project - Data Request  
**Date:** Friday, September 22, 2017 4:48:08 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[image004.jpg](#)

Dennis, I checked with our Engineering Department and all they had was the PDF of the CEQA document. Can you provide the working modeling files? Thank you and have a good weekend.

Please note we are closed on Mondays.

**Jack Cheng**

South Coast Air Quality Management District  
 CEQA IGR  
 (909) 396-2448  
[jcheng@aqmd.gov](mailto:jcheng@aqmd.gov)

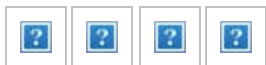
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**From:** Joe, Dennis [<mailto:DJoe@Glendaleca.gov>]  
**Sent:** Tuesday, September 19, 2017 8:14 AM  
**To:** Jack Cheng <[jcheng@aqmd.gov](mailto:jcheng@aqmd.gov)>  
**Subject:** RE: Scholl Canyon Landfill Biogas Renewable Generation Project - Data Request

Hi Jack,

I receiving the requested files from the consultant and will send it soon.

**Dennis C. Joe • City of Glendale • Community Development Department**  
 633 East Broadway, Room 103 Glendale, CA 91206 • (818) 937-8157 • [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)




---

**From:** Jack Cheng [<mailto:jcheng@aqmd.gov>]  
**Sent:** Friday, September 15, 2017 2:25 PM  
**To:** Joe, Dennis  
**Subject:** Scholl Canyon Landfill Biogas Renewable Generation Project - Data Request

Dennis Joe,

Please provide all technical documents related to the air quality (air quality modeling, health risk assessment files, and emission estimates) and greenhouse gas analyses in electronic format. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review

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of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

If you have any questions, please feel free to contact me.  
Thank you.

**Jack Cheng**

South Coast Air Quality Management District

CEQA IGR

(909) 396-2448

[jcheng@aqmd.gov](mailto:jcheng@aqmd.gov)

**Hermosa Beach Office**  
 Phone: (310) 798-2400  
 Fax: (310) 798-2402

**San Diego Office**  
 Phone: (858) 999-0070  
 Phone: (619) 940-4522



**Amy Minter**  
 Email Address:  
[acm@cbcearthlaw.com](mailto:acm@cbcearthlaw.com)

Direct Dial:  
 310-798-2400 Ext. 3

September 26, 2017

*Via Email and U.S. Mail*  
 Dennis Joe  
 Case Planner  
 Glendale Planning Division  
 633 E. Broadway, Room 103  
 Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Request of Extension of Comment Period on Mitigated Negative  
 Declaration for Biogas Renewable Generation Project

Dear Mr. Joe,

On behalf of the Glenoaks Canyon Homeowners Association (GOCHA), we request that the deadline for comments on the Mitigated Negative Declaration (MND) for the Biogas Renewable General Project be **extended from September 30, 2017 until at least October 30, 2017.**

As the City is aware, projects concerning the Scholl Canyon Landfill are of great concern and interest to the residents of Glendale. The Biogas Renewable General Project would be developed on the Scholl Canyon Landfill site to address methane from the landfill and may be used as a basis to claim the life of the landfill should be prolonged. Due to the significant public interest in projects related to the Scholl Canyon Landfill, the City has created a website dedicated to the news and documents relating to the site, to which staff regularly directs community members when they have questions regarding the landfill. The MND for the Biogas Renewable General Project and related documentation was buried under several links at the site, making it nearly impossible for community members to find it.

Additionally, there was a complete lack of transparency regarding this Project on the City's Planning Department website. It was listed under a Los Angeles address, 7721

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N. Figueroa Street, instead of under the Project name or a recognizable address for the Scholl Canyon Landfill.

Due to the lack of good faith public notice regarding the availability of the MND for the Biogas Renewable General Project, members of GOCHA did not uncover its existence, and the rapidly approaching deadline for comments, until a few days ago. The MND and its appendices total more than 1,300 pages of documents that GOCHA will need at least an additional 30 days to review and comment upon. The consequences of this Project are of great concern to GOCHA and many other members of the public and the City should solicit genuine public input regarding it.

For all of these reasons, the City should extend the comment period on the Biogas Renewable General Project MND by at least 30 days and should immediately prominently post the MND and a revised public notice regarding comments on the homepage of the Scholl Canyon Landfill website ([www.schollcanyonlandfill.org/](http://www.schollcanyonlandfill.org/)).

GOCHA further requests notification pursuant to Public Resources Code section 21092.2 for any future notices for projects at or related to the Scholl Canyon Landfill. Notices can be sent electronically to [rmarquis@securedfinancialservices.com](mailto:rmarquis@securedfinancialservices.com).

Thank you for your time and consideration in this matter. We look forward to the City promptly addressing this issue.

Sincerely,



Amy Minteer

Attorney for GOCHA

cc:

Vartan Gharpetian, Mayor, [vgarpetian@glendaleca.gov](mailto:vgarpetian@glendaleca.gov)

Paula Devine, Councilmember, [pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov)

Zareh Sinanyan, Councilmember, [zsinyan@glendaleca.gov](mailto:zsinyan@glendaleca.gov)

Ara Najarian, Councilmember, [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov)

Vreg Agajanian, Councilmember, [vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov)

Phillip Lanzafame, Director of Community Development, [planzafame@glendaleca.gov](mailto:planzafame@glendaleca.gov)

Erik Krause, Acting Deputy Dir. of Community Development, [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)

Steve Zurn, General Manager, Glendale Water and Power, [szurn@glendaleca.gov](mailto:szurn@glendaleca.gov)

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**From:** [Cynthia Kellman](#)  
**To:** [Joe, Dennis](#)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Sinanyan, Zareh](#); [Najarian, Ara](#); [Agajanian, Vrej](#); [Lanzafame, Philip](#); [Krause, Erik](#); [Zurn, Stephen](#); [Amy Minter](#)  
**Subject:** Request of Extension of Comment Period on Mitigated Negative Declaration for Biogas Renewable Generation Project  
**Date:** Tuesday, September 26, 2017 1:41:21 PM  
**Attachments:** [Request for Extension for Biogas Project MND.pdf](#)

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Dear Mr. Joe,

Attached please find a letter of request from Amy Minter regarding the above-captioned subject.

Please feel free to contact me with any questions or concerns.

Cynthia Kellman  
CHATTEN-BROWN & CARSTENS  
2200 Pacific Coast Highway, Ste. 318  
Hermosa Beach, CA 90254  
Tel: 310-798-2400 x6  
Fax: 310-798-2402  
Email: [cpk@cbcearthlaw.com](mailto:cpk@cbcearthlaw.com)  
Website: [www.cbcearthlaw.com](http://www.cbcearthlaw.com)

Hermosa Beach Office  
Phone: (310) 798-2400  
Fax: (310) 798-2402

San Diego Office  
Phone: (858) 999-0070  
Phone: (619) 940-4522



Amy Minter  
Email Address:  
[acm@cbcearthlaw.com](mailto:acm@cbcearthlaw.com)

Direct Dial:  
310-798-2400 Ext. 3

September 26, 2017

*Via Email and U.S. Mail*  
Dennis Joe  
Case Planner  
Glendale Planning Division  
633 E. Broadway, Room 103  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Request of Extension of Comment Period on Mitigated Negative  
Declaration for Biogas Renewable Generation Project

Dear Mr. Joe,

On behalf of the Glenoaks Canyon Homeowners Association (GOCHA), we request that the deadline for comments on the Mitigated Negative Declaration (MND) for the Biogas Renewable General Project be **extended from September 30, 2017 until at least October 30, 2017.**

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Additionally, there was a complete lack of transparency regarding this Project on the City's Planning Department website. It was listed under a Los Angeles address, 7721

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N. Figueroa Street, instead of under the Project name or a recognizable address for the Scholl Canyon Landfill.


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For all of these reasons, the City should extend the comment period on the Biogas Renewable General Project MND by at least 30 days and should immediately prominently post the MND and a revised public notice regarding comments on the homepage of the Scholl Canyon Landfill website ([www.schollcanyonlandfill.org/](http://www.schollcanyonlandfill.org/)).

GOCHA further requests notification pursuant to Public Resources Code section 21092.2 for any future notices for projects at or related to the Scholl Canyon Landfill. Notices can be sent electronically to [rmarquis@securedfinancialservices.com](mailto:rmarquis@securedfinancialservices.com).

Thank you for your time and consideration in this matter. We look forward to the City promptly addressing this issue.

Sincerely,



Amy Minteer

Attorney for GOCHA

cc:

Vartan Gharpetian, Mayor, [vgharpetian@glendaleca.gov](mailto:vgharpetian@glendaleca.gov)

Paula Devine, Councilmember, [pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov)

Zareh Sinanyan, Councilmember, [zsinyan@glendaleca.gov](mailto:zsinyan@glendaleca.gov)

Ara Najarian, Councilmember, [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov)

Vreg Agajanian, Councilmember, [vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov)

Phillip Lanzafame, Director of Community Development, [planzafame@glendaleca.gov](mailto:planzafame@glendaleca.gov)

Erik Krause, Acting Deputy Dir. of Community Development, [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)

Steve Zurn, General Manager, Glendale Water and Power, [szurn@glendaleca.gov](mailto:szurn@glendaleca.gov)

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JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

September 27, 2017

Dennis Joe, Case Planner  
Planning Division  
City of Glendale  
Via email at [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe:

As the City of Los Angeles' Council District 14 representative, which includes Eagle Rock, I would like to thank you for extending the period for public comment to October 20 for the proposed Mitigated Negative Declaration (MND) for the Biogas Renewable Generation Project for Scholl Canyon landfill. As you may be aware, the operation of the landfill is of great concern to my office and the constituents I represent. I am particularly troubled by the fact that my office only recently learned of the proposed MND, especially given our ongoing involvement in the debate over the proposed expansion of the landfill.

4-1

I am deeply concerned that outreach has not been adequate and that the residents of Eagle Rock have not received notification from the City of Glendale about this proposal. My office feels a broader outreach plan to Eagle Rock residents is warranted, and my staff would welcome the opportunity to assist you in this outreach.

4-2

To this end, I respectfully request the following:

1. Allow my office to review and assist in your outreach to Eagle Rock and provide you with contacts to help facilitate effective outreach to all stakeholders.
2. Hold a community meeting in Eagle Rock. My office can assist you in securing the Eagle Rock Recreation Center, which was used successfully for a community meeting regarding the proposed landfill expansion.
3. Provide my office a full briefing on the proposal at your earliest convenience. Please contact Zenay Loera, my District Director, to arrange a time and date at (323) 254-5295 or at [zenay.loera@lacity.org](mailto:zenay.loera@lacity.org).

4-3

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4-5

Eagle Rock residents are primary stakeholders in your project. Though City of Los Angeles businesses and residents are not allowed access to the landfill and are not customers of Glendale Water & Power, we are a neighbor to the site. The only active entrance to the site is through the City of Los Angeles. This access point is adjacent to

4-6



JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

homes, schools, a major City park, and a historic cultural monument – all in the City of Los Angeles. As such, these City stakeholders bear a significant burden from the operation of the landfill. These stakeholders deserve an opportunity to hear the full details about and offer comment on the MND and proposed Biogas Renewable Generation Project. I look forward to a thorough discussion of your project, and respectfully await your prompt response.

Sincerely,

A handwritten signature in cursive script that reads "Jose Huizar".

JOSE HUIZAR  
COUNCILMEMBER, DISTRICT 14  
CITY OF LOS ANGELES

CC: Glendale Mayor Vartan Gharpetian; Councilmember Paula Devine; Councilmember Ara Najarian; Councilmember Zareh Sinanyan; Councilmember Vrej Agajanian; Debra Bogdanoff, Senior Engineer, Sanitation District of Los Angeles County; Steve Zurn, General Manager, Glendale Water and Power; April M. Fitzpatrick, Assistant General Manager, Glendale Water and Power; Maurice Oillataguerre, Environmental Program Administrator, Glendale Water and Power; Los Angeles County Supervisor Hilda Solis



4-6

**From:** [Rich Schmittdiel](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Public Comment on Scholl Canyon EIR Biogas Facility  
**Date:** Wednesday, September 27, 2017 5:09:29 PM

---

Dennis Joe,

I am a 30 year resident of Glenoaks Canyon. I have long been aware of the existence of the Scholl Canyon Landfill. Overall, I believe that facility provides a cost-effective solution to Glendale's solid waste disposal needs. That said, I oppose plans to expand the size and height of the landfill beyond what is currently permitted. I DO support construction and operation of a biogas electrical co-generation facility on the site. Such a facility will reduce the amount of material going into the landfill, and will produce electrical energy from material that would otherwise just be buried or hauled away. This is a GOOD idea and the City should proceed on it.

Richard Schmittdiel  
2234 Hollister Terrace  
Glendale, CA 91206

5-1

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5-3



**DEPARTMENT OF TRANSPORTATION****DISTRICT 7-OFFICE OF REGIONAL PLANNING**

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-0067

FAX (213) 897-1337

www.dot.ca.gov

6

*Making Conservation  
a California Way of Life.*2017 OCT -6 AM 10:07  
PLANNING DIVISION

September 28, 2017

Mr. Erik Krause  
City of Glendale  
633 East Broadway, Room 103  
Glendale, CA 91206

RE: Biogas Renewable Generation  
Vic: LA-134 PM: 11.478  
GTS# 07-LA-2017-01106  
SCH# 2017081062

Dear Mr. Krause,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project includes construction and operation of an approximately 12 megawatt power generation facility that would utilize landfill gas as fuel to generate renewable energy. The proposed power plant would be located on a portion of an approximately 95-acre site in the City of Glendale.

The nearest State facility to the project site is State Route 134. Caltrans does not expect project approval to result in direct adverse impacts to existing State transportation facilities.

Any transportation of heavy construction equipment and/or materials requiring use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that the project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please contact project coordinator, Severin Martinez at (213) 897-0067 or [severin.martinez@dot.ca.gov](mailto:severin.martinez@dot.ca.gov) and refer to GTS# 07-LA-2017-01106

Sincerely,

  
DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

6-1

6-2

6-3



**From:** [Lisa Karahalios](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Proposed air, noise and light pollution  
**Date:** Thursday, September 28, 2017 8:24:40 PM

---

Dear Mr. Joe:

As a resident of Eagle Rock, I object to the proposed burning of gasses at the Glendale Dump. I plan on joining my fellow Eagle rock residents to stop this. There is already a disproportionate impact on Eagle Rock.

Lisa Karahalios

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7-1

**From:** [Flor](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Biogas Renewable Generation Project  
**Date:** Friday, September 29, 2017 11:02:28 AM

---

Good morning Mr. Joe,

I am the homeowner at 7652 N. Figueroa St. Our street consist of only 7 homes and we are directly across from THE RICHARD ALATORRE PARK , AND THE BEAUTIFUL HISTORIC MONUMENT of EAGLE ROCK. We would love the opportunity to learn about this project and learn about the negative effects it will have on our daily lives. We urge you to hold a community meeting at the ER Recreation center so we can learn the details and/or negative impacts of this project. I've read that the project will take over a year to be completed. We are all working parents, family is the most important thing to us, as we all have small children. It is imperative to learn as much as possible about this project; I believe that can be efficiently achieved at a public community meeting. My main concern being the well being and health of our children and neighbors.

Thank you for your time.

Sincerely,  
Flor Mendez

8-1

**From:** [turned@pacbell.net](mailto:turned@pacbell.net)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon Extension  
**Date:** Friday, September 29, 2017 3:53:51 PM

---

Hello Dennis,

I would like to reflect that I am opposed to the extension of use at the Scholl Canyon landfill.

Regards,

Kim Turner

5203 Vincent Ave

Eagle Rock, CA 90041

9-1

**From:** [Sean Starkey](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Najarian, Ara](#); [Sinanyan, Zareh](#); [Agajanian, Vrej](#); [scifeir@lacs.d.org](mailto:scifeir@lacs.d.org); [Zurn, Stephen](#); [Fitzpatrick, April](#); [Oillataguerre, Maurice](#); [firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov)  
**Subject:** Scholl Canyon - 7721 N Figueroa St, Los Angeles, CA 90041  
**Date:** Friday, September 29, 2017 1:13:05 PM  
**Attachments:** [Scholl Canyon Biogas MND.pdf](#)

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On behalf of Los Angeles City Councilmember José Huizar, we would like to thank you for extending the public comment period for the proposed Mitigated Negative Declaration for the Biogas Renewable Generation Project for Scholl Canyon landfill.

As the City of Los Angeles' Council District 14 representative, which includes the community of Eagle Rock, Councilmember Huizar is concerned that adequate outreach has not been done to residents in our community affected by this project.

He is requesting a public meeting be held in Eagle Rock. Our staff would be happy to assist you in securing a location and facilitating outreach to all stakeholders. Please contact Zenay Loera, our District Director, to arrange a time and date at [323.254.5295](tel:323.254.5295) or at [zenay.loera@lacity.org](mailto:zenay.loera@lacity.org).

Please see the attached letter from Councilmember Huizar.

Sincerely,

Sean Starkey  
Field Deputy - Eagle Rock  
Office of Councilmember José Huizar  
City of Los Angeles | Council District 14

Northeast Office  
2035 Colorado Blvd.  
Los Angeles, CA 90041  
[\(323\) 254-5295](tel:323.254.5295) office | [\(213\) 485-8788](tel:213.485.8788) fax





JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

September 27, 2017

Dennis Joe, Case Planner  
Planning Division  
City of Glendale  
Via email at [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe:

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10-3

I am deeply concerned that outreach has not been adequate and that the residents of Eagle Rock have not received notification from the City of Glendale about this proposal. My office feels a broader outreach plan to Eagle Rock residents is warranted, and my staff would welcome the opportunity to assist you in this outreach.

10-4

To this end, I respectfully request the following:

1. Allow my office to review and assist in your outreach to Eagle Rock and provide you with contacts to help facilitate effective outreach to all stakeholders.
2. Hold a community meeting in Eagle Rock. My office can assist you in securing the Eagle Rock Recreation Center, which was used successfully for a community meeting regarding the proposed landfill expansion.
3. Provide my office a full briefing on the proposal at your earliest convenience. Please contact Zenay Loera, my District Director, to arrange a time and date at (323) 254-5295 or at [zenay.loera@lacity.org](mailto:zenay.loera@lacity.org).

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Eagle Rock residents are primary stakeholders in your project. Though City of Los Angeles businesses and residents are not allowed access to the landfill and are not customers of Glendale Water & Power, we are a neighbor to the site. The only active entrance to the site is through the City of Los Angeles. This access point is adjacent to

10-8



JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

homes, schools, a major City park, and a historic cultural monument – all in the City of Los Angeles. As such, these City stakeholders bear a significant burden from the operation of the landfill. These stakeholders deserve an opportunity to hear the full details about and offer comment on the MND and proposed Biogas Renewable Generation Project. I look forward to a thorough discussion of your project, and respectfully await your prompt response.



10-8

Sincerely,

A handwritten signature in cursive script that reads "Jose Huizar".

JOSE HUIZAR  
COUNCILMEMBER, DISTRICT 14  
CITY OF LOS ANGELES

CC: Glendale Mayor Vartan Gharpetian; Councilmember Paula Devine; Councilmember Ara Najarian; Councilmember Zareh Sinanyan; Councilmember Vrej Agajanian; Debra Bogdanoff, Senior Engineer, Sanitation District of Los Angeles County; Steve Zurn, General Manager, Glendale Water and Power; April M. Fitzpatrick, Assistant General Manager, Glendale Water and Power; Maurice Oillataguerre, Environmental Program Administrator, Glendale Water and Power; Los Angeles County Supervisor Hilda Solis

# CITY OF LOS ANGELES

## CALIFORNIA

**HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL**  
 Post Office Box 50791  
 Los Angeles, CA 90050  
<http://www.highlandparknc.com>  
 Certified as NC #33 May 28, 2002

**OFFICERS**  
 Harvey Slater **PRESIDENT**  
 Daniel Andalon **FIRST VICE PRESIDENT**  
 Antonio Castillo **SECOND VICE PRESIDENT**  
 Joan Potter **TREASURER**  
 Rocío Rivas **SECRETARY**

**DIRECTORS AT LARGE**  
 Liz Amsden, Elizabeth Andalon, SuzAnn Brantner, Linda "Boo"  
 Caban, Gabriel Chabran, Melanie Freeland, Zacharias Gardea,  
 Susanne Huerta, Sheri Lunn, Marcus Moché, Stanley Moore,  
 Yolanda Nogueira, Diego Silva, Jamie Tijerina



**DEPARTMENT OF NEIGHBORHOOD EMPOWERMENT**  
 200 N. Spring St. Ste.2005  
 Los Angeles, CA 90012  
 Telephone: (213) 978-1551

**COMMITTEE CHAIRS**  
 Harvey Slater **EXECUTIVE**  
 Daniel Andalon **RULES**  
 Joan Potter **BUDGET & FINANCE**  
 Yolanda Nogueira **OUTREACH**  
 Antonio Castillo, Susanne Huerta **LAND USE**  
 Rocío Rivas **FAMILY, YOUTH & EDUCATION**  
 Vacant **PUBLIC SAFETY**  
 Yolanda Nogueira, Rocío Rivas **HOUSING &  
 HOMELESSNESS**  
 Yolanda Nogueira, Rocío Rivas **BEAUTIFICATION**  
 Jamie Tijerina **CULTURE AND EQUALITY**  
 Gabriel Chabran **ARTS**  
 SuzAnn Brantner **SUSTAINABILITY**

# Historic Highland Park Neighborhood Council

October 5, 2017

Mayor Eric Garcetti & the Los Angeles City Council  
 200 N. Spring Street  
 Los Angeles, CA 90012

cc: Los Angeles Energy, Climate Change and Environmental Justice Committee  
 City of Glendale City Council and Glendale Department of Water and Power

Re: Stop Glendale from building a new biogas plant at the Scholl Canyon landfill

The Historic Highland Park Neighborhood Council which represents over 60,000 Los Angeles stakeholders who reside, own property, or conduct business in our neighborhood calls on the City Council to immediately join with Councilmembers Huizar and demand Glendale require an EIR on the impact of the construction and operation of the proposed biogas plant at the Scholl Canyon landfill for northeast Los Angeles BEFORE any further steps are taken in connection with this project.

Three years ago our Neighborhood Council joined with Councilmember Huizar and many other organizations in the northeast to oppose the unnecessary expansion plans for the Scholl Canyon Landfill, located just behind the hills above the 134 Freeway and accessed via Figueroa Street near the Eagle Rock Recreation Center. While the Scholl dump is on the outskirts of Glendale, it overlooks northeast Los Angeles and any changes there affect our neighborhoods' health, safety, and economy. Glendale's Environmental Impact Report totally ignored Los Angeles stakeholders and focused only on the impacts on Glendale's air, water, views, and traffic.

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## HPNC - Stop Glendale from building a new biogas plant at the Scholl Canyon landfill

And now a new plan for a "Biogas Renewable Generation Project" – an on-site processing plant for the natural gas produced by the existing garbage in the dump – was set to have its comment period close on September 30<sup>th</sup>. But Councilmember Huizar and his staff have secured a 21-day extension. For this they have our thanks.

This new project is listed as in the 90041 zip code yet there has been no outreach to the organizations representing the interests of Eagle Rock stakeholders.

As with the dump expansion there are serious concerns about air quality – especially toxic particulate matter, groundwater contamination, noise, and aesthetics (since the proposed location above Eagle Rock already has visible lights and trailers) both during and after the construction period. The location will probably have to be significantly expanded to accommodate the water tanks and the lights and noise will be an ongoing concern for Eagle Rock since it appears that the power plant will operate 24-7.

The sole access point is at the northern end of Figueroa, adjacent to homes, schools, a major City park, and a historic cultural monument – all in the City of Los Angeles so City stakeholders bear a significant burden from the current operation of the landfill, including trash and debris, pollution, traffic, and deteriorating road conditions in the area around the entrance to the landfill.

The construction itself which will take more than a year will further exacerbate the use of the Figueroa corridor since the Glendale City Council refused to allow dump trucks to use the Glenoaks Blvd access many decades ago.

Meanwhile the dump continues to percolate known carcinogens and other toxic chemicals through the fractured bedrock below it into the groundwater west of the landfill adjacent to City water supplies.

Pollution doesn't just stop at the border of Glendale or even Eagle Rock. The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipelines rupture, the gas and explosions won't magically stop at a city line; if there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected.

A competent EIR addressing the concerns of northeast Los Angeles will show the landfill is unsustainable under any circumstances, and is irreconcilable with our vision of a greener California. Right now, Los Angeles needs to call on Glendale to shut the dump down and focus on clean up and remediation along our shared border. The first step is to stop further investment which will drive dump expansion.

The Historic Highland Park Neighborhood Council commends Councilmember Huizar for his initial action and requests that the Mayor and City Council join him in protecting the health and quality of life for Angelenos in Highland Park and the other communities of northeast Los Angeles by taking all steps necessary to demand a Los Angeles-centric EIR and stop Glendale moving forward with this project.

Sincerely,



Harvey Slater, President  
Historic Highland Park Neighborhood Council

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**From:** [Greg Merideth](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [David Greene](#); [Sean Starkey](#)  
**Subject:** Scholl Canyon - Biogas Renewable Generation Project  
**Date:** Monday, October 09, 2017 5:04:44 PM  
**Attachments:** [Scholl Canyon - Biogas.pdf](#)

---

Dear Mr. Joe -

Attached, please find a request from The Eagle Rock Association regarding the City of Glendale's proposed biogas renewable generation project. If you have any questions, please feel free to contact me.

----

Greg Merideth  
President  
The Eagle Rock Association  
(323) 240-2238



October 9, 2017

Mr. Dennis Joe  
Community Development Department  
633 East Broadway, Room 103  
Glendale, California 91206-4386

RE: Scholl Canyon - Biogas Renewable Generation Project

Dear Mr. Joe:

On behalf of the board of The Eagle Rock Association (TERA), I am writing you regarding the City of Glendale's proposed biogas renewable generation project at the Scholl Canyon Landfill. The TERA board, along with others within the community of Eagle Rock, have many questions regarding this project. We believe that since the Scholl Canyon facility abuts and has its sole access through our community, it is fair to request that the City of Glendale provide a forum for our community members to pose those questions and have them answered.

12-1

As such, TERA requests that the City of Glendale:

- 1) Immediately hold a special hearing for and in the community of Eagle Rock;
- 2) Further extend the comment period until November 30, 2017 so that the hearing can be held and sufficient time remain for public comment.

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Thank you for your attention to this matter. I hope that the City of Glendale will see the reasonableness of this request and will grant it. If you have any questions, please feel free to contact me.

Sincerely,

Greg Merideth  
President

cc: Sean Starkey, Deputy, L.A. Council District 14  
David Greene, Eagle Rock Neighborhood Council



MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

13

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: EP-0

October 10, 2017

Mr. Steve Zurn  
General Manager  
Glendale Water & Power  
141 North Glendale Avenue  
Glendale, CA 91206

Dear Mr. Zurn:

### **SCHOLL CANYON LANDFILL BIOGAS RENEWABLE GENERATION PROJECT PROPOSED MITIGATED NEGATIVE DECLARATION**

On October 3, 2017, Dorine Martirosian of your City Attorney's office contacted Ms. Julia Weissman of the Office of County Counsel to request that the County of Los Angeles Department of Public Works acknowledge that it is aware of the City's proposed Scholl Canyon Landfill Biogas Renewable Generation Project and the City's preparation of a Mitigated Negative Declaration (MND) for the project. We understand that the comment period for this MND originally was set to run from August 31, 2017, through September 30, 2017, and was extended to October 20, 2017.

13-1

After checking our records and making inquiries, Public Works has not been able to locate receipt of any Notice of Intent to Adopt the MND, and was unaware that the City had prepared the MND and released it for public comment until your City Attorney's office contacted our County Counsel regarding this matter. As the owner of property on which the project is proposed to be built and a member of the Joint Powers Authority that governs the operation of the Scholl Canyon Landfill, we believe that it is important for the County to have sufficient time to review the MND and prepare comments and that this opportunity is supported under the California Environmental Quality Act. Therefore, we are requesting that the City further extend the comment period until thirty (30) days from the date of this letter.

13-2

Mr. Steve Zurn  
October 10, 2017  
Page 2

If you have any questions, please contact Ms. Shari Afshari at (626) 458-4008 or [safshari@dpw.lacounty.gov](mailto:safshari@dpw.lacounty.gov).

Very truly yours,

MARK PESTRELLA  
Director of Public Works



SHARI AFSHARI  
Deputy Director

CR:ao

h/adhome/ao/EPD/Scholl Canyon Landfill Mr Zurn

cc: County Counsel (Julia Weissman)  
Sanitation Districts of Los Angeles County (Grace Robinson Hyde)  
Glendale City Attorney (Dorine Martirosian)  
Lewis Brisbois (Claire Hervey Collins)

2351 E. Glenoaks Blvd.  
Glendale, CA 91206  
October 15, 2017

2017 OCT 15 12:45:00

PLANNING DIVISION

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is sent to comment on the proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill. Because there is a glut of power on the market, the public should be informed why the current pipes that take the methane to Grayson can no longer be used. If a plant must be built, please consider building a much less expensive plant that produces less power and would be more appropriate for a landfill situated near residential neighborhoods such as at Toyon Landfill in Griffith Park (link provided below). Finally, it seems that there have been CEQA violations in not including this MND in the Grayson Repowering Project EIR. This project requires an EIR and also should be reconsidered for current needs and budgets.

- According to a 2-5-17 article in the *Los Angeles Times* ("Californians are paying billions for power they don't need"), California has a glut of electricity on the market. Why are we building yet another power plant?

*California has a big — and growing — glut of power, an investigation by the Los Angeles Times has found. The state's power plants are on track to be able to produce at least 21% more electricity than it needs by 2020, based on official estimates. And that doesn't even count the soaring production of electricity by rooftop solar panels that has added to the surplus. To cover the expense of new plants whose power isn't needed — Colusa, for example, has operated far below capacity since opening — Californians are paying a higher premium to switch on lights or turn on electric stoves. In recent years, the gap between what Californians pay versus the rest of the country has nearly doubled to about 50%. This translates into a staggering bill. Although California uses 2.6% less electricity annually from the power grid now than in 2008, residential and business customers together pay \$6.8 billion more for power than they did then. The added cost to customers will total many billions of dollars over the next two decades, because regulators have approved higher rates for years to come so utilities can recoup the expense of building and maintaining the new plants, transmission lines and related equipment, even if their power isn't needed. How this came about is a tale of what critics call misguided and inept decision-making by state utility regulators, who have ignored repeated warnings going back a decade about a looming power glut. In California, we're blinding ourselves to the facts," said*

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*Loretta Lynch, a former president of the California Public Utilities Commission, who along with consumer advocacy groups has fought to stop building plants. "We're awash in power at a premium price."*

<http://www.latimes.com/projects/la-fi-electricity-capacity/>

- Because there is a glut of power, why not continue to use the pipes that currently take the methane from Scholl Landfill to Grayson?
- If a power plant does need to be built at Scholl, why not build a much less expensive one? I recommend you consider a power plant such as was built at the Toyon Landfill in Griffith Park. It produces 1 MW of electricity and cost \$ 3.2 million. This type of power plant not only addresses the glut of electricity on the market but is much more affordable for the City of Glendale. Information about it is on this website: <http://www.businesswire.com/news/home/20160519005334/en/Ener-Core-Receives-Purchase-Order-Install-EC-250-EcoStations>
- Finally, the Biogas Generation Project seems to be directly related to the Grayson Repowering Project. If so, why is it not included in that Draft EIR? It seems this MND is being piecemealed or segmented which is a violation of CEQA (California Environmental Quality Act). As the 4th District Court of Appeal ... noted in Banning Ranch Conservancy v. City of Newport Beach (12/12/12), "CEQA forbids 'piecemeal' review of the significant environmental impacts of a project. (Citation omitted) Agencies cannot allow 'environmental considerations [to] become submerged by chopping a large project into many little ones — each with a minimal potential impact on the environment — which cumulatively may have disastrous consequences.'" <https://www.avvo.com/legal-guides/ugc/piecemeal-review-of-projects-under-ceqa>

Please give further to consideration to the proposed Biogas Generation Project. A much less expensive power plant could be built. Also, this MND violates CEQA guidelines and should have been included in the Grayson EIR. Thank you for your consideration of my thoughts on this subject.

Best regards,

*Frances F. Coburn PhD*

Frances F. Coburn, PhD

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2351 E. Glenoaks Blvd.  
Glendale, CA 91206  
October 15, 2017

2017 OCT 19 9:44:00  
FEDERAL BUREAU OF INVESTIGATION

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter will comment on the Aesthetics portion of the Mitigated Negative Declaration (MND) for the Biogas Renewable Generation Project. The Aesthetics portion of the MND omitted to discuss the fact that the area surrounding the proposed project has been included in the Rim of the Valley Corridor Preservation Act, which would expand the boundaries of the Santa Monica National Recreation Area. Also omitted in the discussion on Aesthetics was how this project will impact locations outside of the City of Glendale. The MND discussion in Regulatory Settings has unfairly characterized the impact the project within the residential setting of Glenoaks Canyon as being one of "low visual sensitivity." Finally, this MND project has been "piecemealed" as it is one of several projects planned for the Scholl Canyon Landfill. The aesthetic impacts of this project should be evaluated with impacts of the three projects together to give a more accurate portrait of what will be occurring on the landfill. To piecemeal or to not present all projects at once is a violation of CEQA guidelines. This letter is to request that an Environmental Impact Report be conducted so that all proposed projects could be evaluated as a whole in each area of impact, including Aesthetics.

**3.1 Aesthetics**

**3.1.1 Settings:** The discussion on settings in the MND of the Biogas Renewable Generation Project mentions the "natural beauty, such as visual and scenic resources as aesthetic functions that contain natural beauty" and goes on to say "there are no designated scenic vistas near the Proposed Project or within other parts of the existing SCFL, nor are there any designated scenic vistas from which the proposed Project would be visible." Unfortunately, the MND neglected to mention that the beautiful San Rafael Hills surrounding the SCL have been included in the Rim of the Valley Corridor Preservation Act, which would expand the boundaries of the Santa Monica Mountains National Recreation Area. Congressman Adam Schiff is slated to reintroduce this legislation to the House in late October 2017(see following satellite photo).

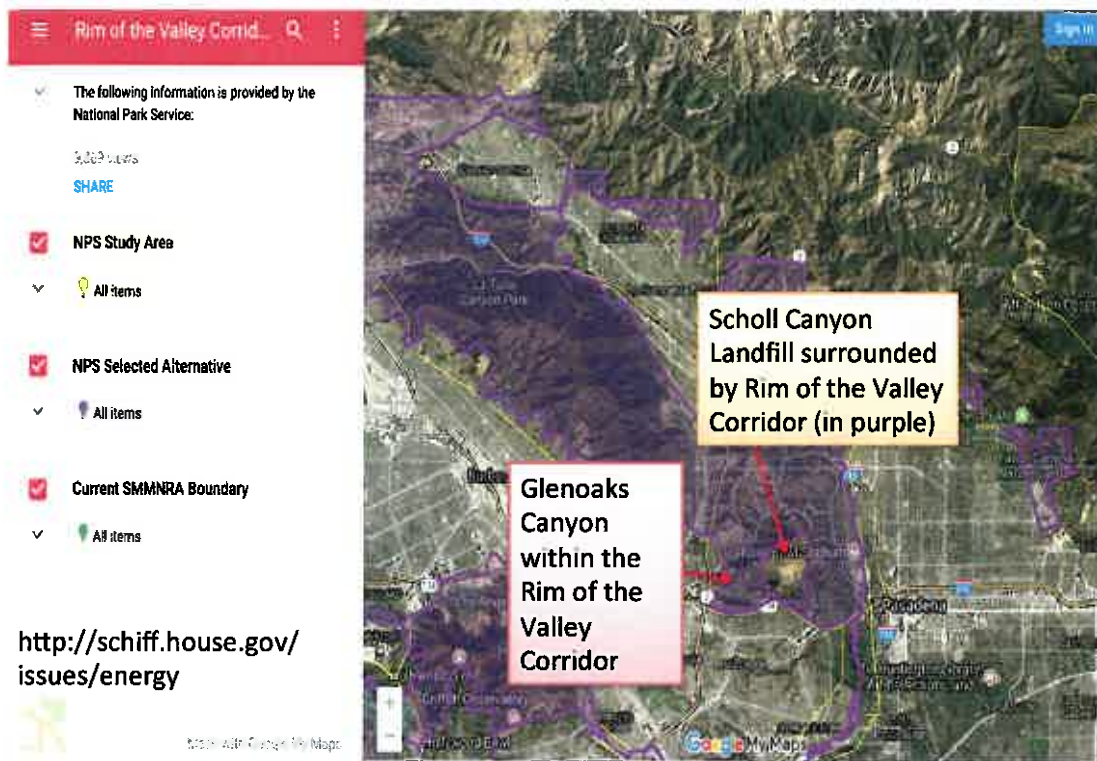
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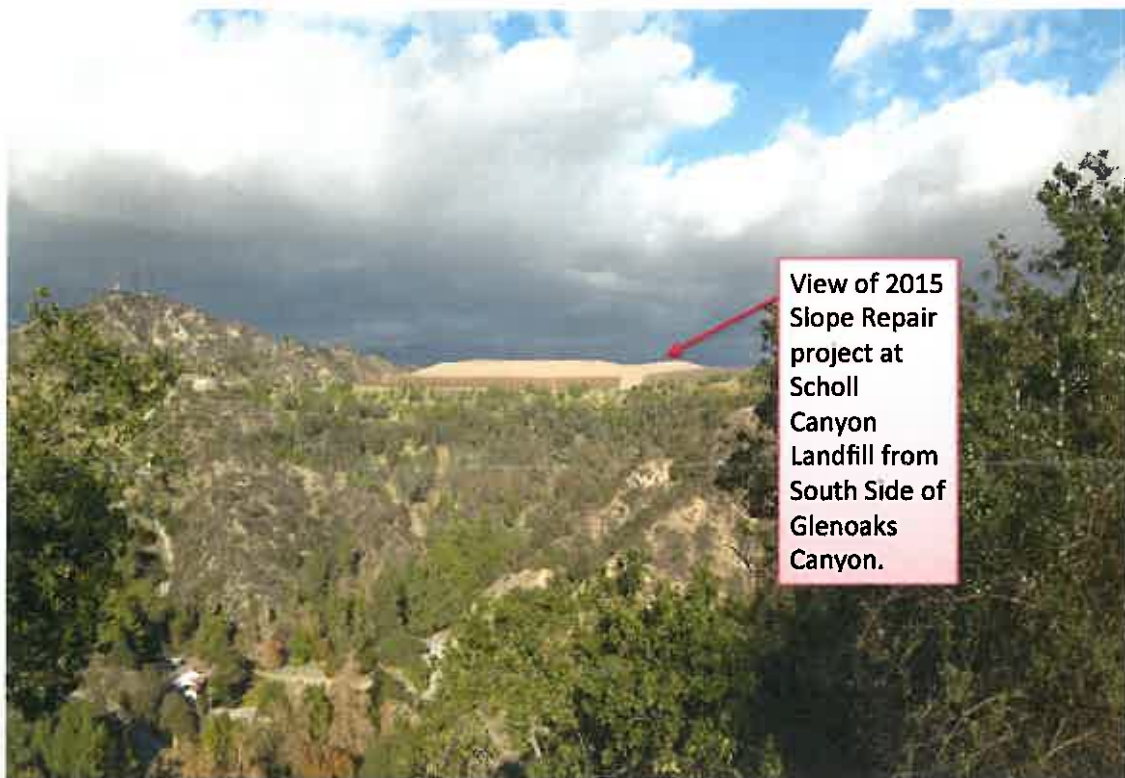
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Not including this act in the MND is an oversight, minimizing the importance of the natural beauty surrounding the landfill and which is greatly valued by residents in areas immediately surrounding the landfill. The following photos illustrate the beauty of the area and how the landfill's presence (specifically the 2015 Slope Repair Project" at Scholl Canyon Landfill) has adversely impacted its scenic beauty.







View of 2015 Slope Repair project at Scholl Canyon Landfill from South Side of Glenoaks Canyon.

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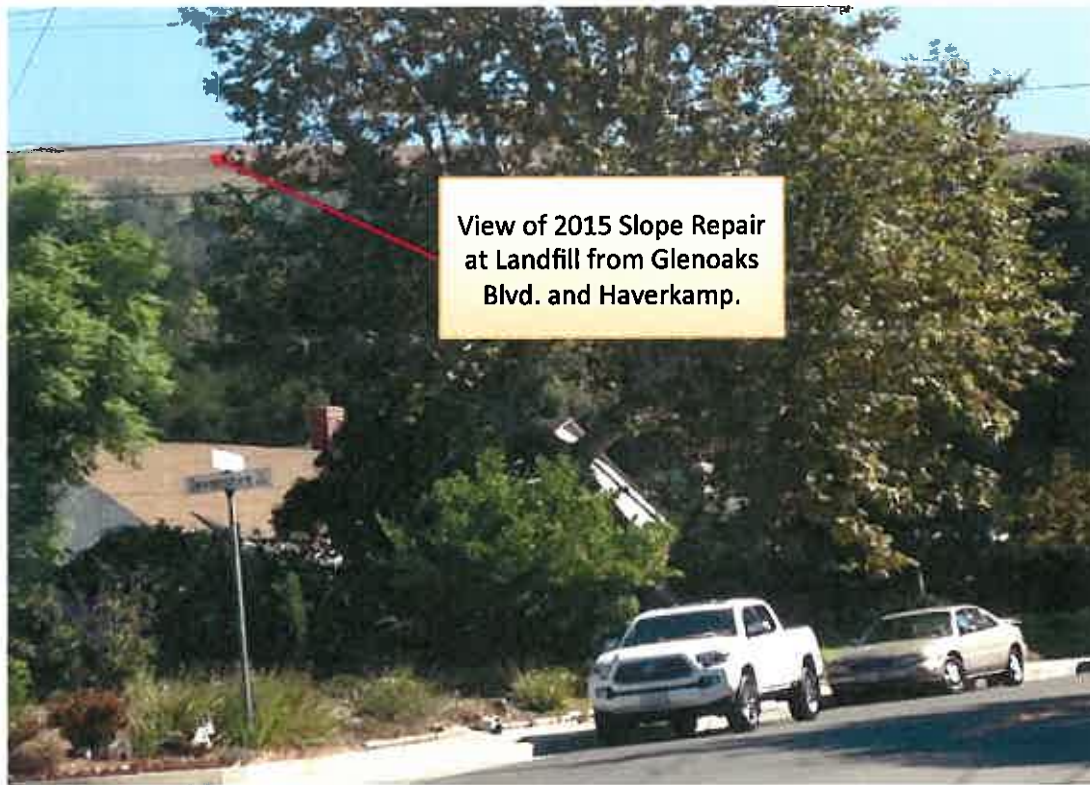
Secondly, the MND discussion of scenic vistas focuses solely on the City of Glendale and does not include areas to the south that are adjacent to the Scholl Canyon Landfill and may include views of the Biogas Renewable Generation Project such as: The Richard Alatorre Park, The Eagle Rock Canyon Trail, 5499 Eagle Rock View Drive, Los Angeles, CA 90041 and the Eagle Rock Hillside Park, 2646-2978 Scholl Canyon Road, Los Angeles, CA. Furthermore, the MND report does not take into account the westward views from the Linda Vista area in Pasadena or possible impacts on the heavily used Rose Bowl recreation area.

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**Regulatory Settings:** According to Map 4-25, “Ridgelines and Streams of the San Rafael Hills, Scholl canyon is not a primary or secondary ridgelines (City of Glendale, 1993), and therefore is characterized as an area of “low visual sensitivity.” This negates the beauty for those living within boundaries of Scholl or Glenoaks Canyon, which is an area of supposedly low visual sensitivity. All aspects of the continued operation of the landfill and the proposed future projects (Biogas Renewable Generation Project, Anaerobic Digester, Expansion Project) along with the current landfill itself work to expand the presence of the landfill to surrounding communities. One project directly affects another so that whereas the Biogas Generation project may not be visible as a ridgeline, residences below the ridgeline are affected by the looming presence of the landfill. For example, the berm that has been created as a result of the “Slope Repair Project” in 2015 can be widely seen throughout the canyon as well as from the surrounding hillsides as seen in the previous photos. This photo is evidence that landfill expansion projects

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adversely affect the so-called “low visual sensitivity” areas in the canyon, not just the ridgelines.



The photos from the Slope Repair Project illustrate why residents of Glenoaks Canyon are very concerned about the effects of the Biogas Generation Project and the subsequent expansion that it represents. The MND does not adequately address aesthetic consequences of projects such as the Biogas Generation Project that will expand the landfill. Legal requirements regarding aesthetic impacts include the following, “[A]ny substantial, negative effect of a project on view and other features of beauty could constitute a “significant” environmental impact under CEQA.” (*Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4<sup>th</sup> 1597, 1604.) According to the California Court of Appeal, lay opinions that articulate the basis of the opinion can constitute substantial evidence of a negative aesthetic impact. (*Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District* (2004) 116 Cal.App.4<sup>th</sup> 396, 402.) Expert testimony on the matter is not required because the overall aesthetic impact of a project is a subjective matter for which personal observations are sufficient evidence of the impact. (*Id.*; *Oro Fine Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 882.)

Of great concern is the fact that this Biogas Generation Project is presented as a project all by itself. Although not mentioned in the MND for the Biogas Generation

Project, the current EIR for the Grayson Repowering Project makes many references to the fact that the "Biogas Generation Project," as well as the "Anaerobic Digestion Project" are a related part of the Expansion of the landfill itself, which is still under active consideration. CEQA requires that environmental review documents analyze "the whole of an action" (CEQA Guidelines § 15378) and not evade comprehensive CEQA analysis by splitting projects into separate pieces for purposes of environmental review. "One way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1226.) Here, the Biogas Renewable Generation Project relies upon the gas produced by the Scholl Canyon Landfill to operate. Thus, the Biogas Project and the Scholl Canyon Landfill project are intrinsically linked. The MND's claim that this project has independent utility is without merit. "The idea that all integral activities are part of the same CEQA project does not establish that *only* integral activities are part of the same CEQA project." (*Id.* at 1229, emphasis in original.) The Biogas Project and the Scholl Canyon Landfill Expansion Project were always intended to be implemented hand in hand and the same site. The City cannot now evade full CEQA review of the Biogas Project by segmenting review of this component of the Scholl Canyon Landfill Expansion.

Thus, there have been grave omissions in the Aesthetic portion of the MND for the Biogas Generation Project. The MND neglected to mention that Glenoaks Canyon has received national recognition for its natural beauty as evidenced by its inclusion in the Rim of the Valley Corridor. It also neglects to consider how the Biogas Generation Project will influence areas in Los Angeles and Pasadena. The Aesthetics review wrongly assumes that areas below the ridgeline are low impact. Photos provide evidence how Glenoaks Canyon residents are already adversely affected by views of the landfill. Per CEQA Guidelines, "lay opinions that articulate the basis of the opinion can constitute substantial evidence of a negative aesthetic impact." Finally, this MND is not sufficient for evaluating the impacts. The Biogas Generation Project is directly linked to the Anaerobic Digestion Project; the Expansion of the landfill and presenting the Biogas Generation Project by itself is in violation of CEQA guidelines, which prohibit a piecemeal approach to a project. This MND is insufficient for the Biogas Generation Project. An Environmental Impact Report is what is legally required.

Sincerely,



Joan Morris  
Board Member, Glenoaks Canyon Homeowners Association

**From:** [MeHee Hyun](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Biogas Renewable Generation and Grayson projects  
**Date:** Monday, October 16, 2017 5:31:20 PM

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Dear GWP Commissioners,

As a resident of the 90041, I'm writing to ask that an environmental impact report be done before any further consideration of the Biogas Renewable Generation and Grayson projects proceed. I would hope that as part of the investigation into this rather significant development in our neighborhood there is consideration for, in addition to all of the other environmental concerns, the potential fire danger that this might cause. These projects are very near a good deal of dry hillside, while adjacent to a large residential community on the Los Angeles as well as the Glendale side. The recent fires, especially in Northern California, should give us all additional pause to scrutinize things that might increase the risk of this sort of devastation.

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Sincerely,  
MeHee Hyun

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MeHee Hyun, Ph.D.  
Core Faculty and Co-Chair,  
Undergraduate Studies  
Antioch University Los Angeles  
PHONE: (310) 578-1080 x101

email: [mhyun@antioch.edu](mailto:mhyun@antioch.edu)  
400 Corporate Pointe  
Culver City, CA 90230

**From:** [Susan Phillips](#)  
**To:** [Joe. Dennis](#)  
**Subject:** School Canyon public comment for 10-16-17  
**Date:** Monday, October 16, 2017 5:24:51 PM

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17

Dear Glendale Planners,

I am writing as community member in Eagle Rock, neighbor to the Scholl Canyon project.

I am writing to urge you to conduct a full EIR for this project in conjunction with the Grayson project. While your Mitigated Negative Declaration for the Scholl Canyon project states that there will be minimal to no adverse impacts of the project in terms of air quality, traffic, visual character, light, noise and so forth, the EIR should be done by an outside party. Noise and air quality are my two greatest concerns at this time—it is not reassuring to me that there will not be mining like blasting or pile driving. It is unclear to me that not being in excess of the Noise Element is satisfactory.

I would like to request that a full EIR be done by an outside, neutral party in order so that we may further determine the impact of this project on our neighborhood.

Also I am concerned that the public comment period has been rushed and has included little to no outreach to Eagle Rock residents. I would like for this period to be extended so that we may review the documents at hand in a more deliberate, informed manner. If not, my concern is also a lack of transparency and goodwill that takes into account not only the best interests of Glendale but also the needs and concerns of Los Angeles residents who border these projects.

Best wishes,

Susan

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October 17, 2017

Communities United is a multi-jurisdiction nonpartisan coalition formed in 2015, one year after Glendale announced an effort in May 2014 to expand by 17 more stories (180 feet) and extend by at least 20 more years the trash pile at Scholl Canyon. Scholl Dump sits on more than 500 acres at the north end of Figueroa Street, in the southeast corner of Glendale, near the landmark Eagle Rock, just north of the 134 Freeway, not far from the western boundary of Pasadena.

All garbage enters Glendale's dump through Eagle Rock, with hundreds of dump trucks each day depositing tons of trash at the site. Pollution stemming from Glendale's dump imposes major health burdens, costs, anxiety, and degradation of value on its neighbors.

The dump opened in 1961, before federal standards required a solid rock base beneath dumps. Despite Scholl Dump's many documented perils to nearby residents—including dump contaminants leaching through the shattered rock base of the dump into the water table—there is no sunset date yet for this symbol of backward waste policies by Glendale.

There are many reasons to oppose the Gas Plant at Scholl Dump, from pollution to public integrity.

First, opening a gas-powered plant in terrain with known fire risks is a recipe for disaster. Is it really safe to build a Gas Plant in Scholl Canyon, given that wind-driven wildfires, such as in April 2015, regularly plague the area?

Burning the methane produced by the decay of the 56-year-old dump is vastly better for the climate than releasing it. Methane presently captured at the dump is piped off site for power generation. Would the presence of a Gas Plant at Scholl Dump be used to justify prolonging operation of the dump? Local residents are calling for its closure and holding Glendale accountable to its own Zero-Waste Resolution (unanimously passed Dec. 6, 2011: see [http://www.ci.glendale.ca.us/public\\_works/pdf/ZeroWasteResolution.pdf](http://www.ci.glendale.ca.us/public_works/pdf/ZeroWasteResolution.pdf)). The resolution commits the city to 90 percent waste diversion by 2030 and nearly eliminate dumping.

Second, Glendale has failed to operate a transparent and accountable process on the Gas Plant at Scholl Dump that the city is proposing. Before local residents and civic organizations in Eagle Rock or Glendale could ask or get answers for questions about the dump site and its hazards, Glendale closed the comment period to end official public input. That deadline is later this week, on Oct. 20. Glendale has not allowed residents a fair opportunity to review their scheme before this deadline.

Third, this lack of transparency and accountability by Glendale fits a pattern we have seen going back to the effort the city announced in 2014 with a DEIR to prolong and vastly heighten trash dumping. Only determined, outspoken resistance secured extensions in the comment deadlines then and ultimately stopped Glendale from proceeding with its plan.

18-1  
18-2  
18-3  
18-4  
18-5  
18-6  
↓

We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

18-6

Name: John Goldfarb Org. ERNIC Land Use Signature: John Goldfarb

Name: David Smeane Org. ERNIC Signature: David Smeane  
*NOT an official endorsement*

Name: James Panozzo Org. ERNIC Signature: James Panozzo  
*community member*

Name: Julia Eggleston Org. ERNIC Signature: Julia Eggleston  
*community member*

Name: Farah Johansen Org. Community Member Signature: Farah Johansen

Name: Anya Silverman-Stoloff Org. Community member Signature: Anya Silverman-Stoloff

Name: Zoe Alles Org. Community member Signature: Zoe Alles

Name: Gabriella Myrland Org. Community member Signature: Gabriella Myrland

Name: Alexandra Healey Org. community member Signature: Alexandra Healey

Name: Aidan Holliday Org. Community member Signature: Aidan Holliday

Name: Michael Jimenez Org. community member Signature: Michael Jimenez

Name: Greg Feiner Org. community member Signature: Greg Feiner

Name: Randy Levine Org. community Signature: Randy Levine



We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Margaret Siegel Org. EAPD Signature: Margaret Siegel

Name: Mary Fischer Org. EAPD Signature: Mary Fischer

Name: Helen Mallory Org. GOCHA Signature: Helen Mallory

Name: Owen Lewis Org. CFLA Signature: Owen Lewis

Name: GREG MERIDETH Org. TERA Signature: Greg Merideth

Name: MICHAEL STRICKLAND Org. EAPD Signature: Michael Strickland

Name: Hans Johnson Org. Communities United Signature: Hans Johnson

Name: Audrey Zarkian Org. CFLA Signature: Audrey Zarkian

Name: Mark Fernandes Org. GOCHA Signature: MARK FERNANDES

Name: MiJin Org. CFLA Signature: MiJin Fernandes

Name: Sharon Landin Org. GOCHA Signature: Sharon Landin

Name: Eitan Sadel Org. EOPD Signature: Eitan Sadel

Name: EITAN SADEL Org. EAPD Signature: Eitan Sadel

We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Marla Nelson Org. EAPP GOCHA/CFLA Signature: Marla Nelson

Name: Bob Hutchins Org. GOCHA Signature: Bob Hutchins

Name: Amy G Koss Org. CFLA Signature: Amy G Koss

Name: Mitch H Koss Org. CFLA Signature: Mitch H Koss

Name: Claudia Puig Org. GOCHA/CFLA Signature: Claudia Puig

Name: LUIS LOPEZ Org. TERA Signature: Luis Lopez

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

email: [drdavechoi@gmail.com](mailto:drdavechoi@gmail.com)  
 2203 Hollister Terrace  
 Glendale, California 91206  
 October 17, 2017

Mr. Dennis Joe, Planner  
 City of Glendale — Community Development Department  
 633 East Broadway, Room 103  
 Glendale, California 91206

Dear Mr. Joe:

The Mitigated Negative Declaration for the proposed “Biogas Renewable Generation Project” raises three severe air quality issues: criteria pollutant emissions; a misleading air modeling study; and unaddressed toxic air contaminants (TACs).

#### Criteria Pollutant Emissions

Table 3.3-12 Criteria Pollutant Emission Summary, GE J 620 GS-16, shows that the project will emit more pollutants than are allowed by SCAQMD.

Pollutant	Proposed	Permitted
NO2	165 lbs/day	55 lbs/day
CO	919 lbs/ay	550 lbs/day
VOC	114 lbs/day	55 lbs/day
PM2.5	58 lbs/day	55 lbs/day

The City of Glendale plans to offset these violations through Priority Reserve credits earned, in part we assume, from closing the Grayson methane processing generators and closing the dedicated pipeline from Scholl Canyon to Grayson as part of the Grayson Repowering Project. Emissions at Grayson may be reduced, but regardless of offsets elsewhere, the new Scholl generators will intensify pollution for the many thousands of residents living, working and playing within two miles of the landfill, for example; Glenoaks Canyon, Chevy Chase Estates, Rancho San Rafael, Linda Vista, Eagle Rock, Pasadena, and La Canada.

#### Misleading Air Modeling Study

The MND reports in section 3.3 that the nearest ambient air quality monitoring stations for criteria pollutants are located four miles away in Pasadena and six miles away in Los Angeles at North Main Street. This is very perplexing because there are tens of thousands or more residents much closer to the landfill, including those in Glendale, Eagle Rock, Pasadena, and La Canada.

19-1  
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Table 3.3-14, AERMOD Model Output is particularly misleading. It claims that the new ambient air quality will be just fine. To assess the future ambient air quality level at the edge of the landfill after the installation of the biogas plants, the analysis adds the projected pollutant level from the biogas project using air dispersion models to the background levels to compare against the limiting standard (CAAQs or NAAQs). The problem is that the background levels in the analysis are again the measures from Pasadena (four miles away) and Los Angeles (6 miles away). Numbers are added that should not be. The combined values do not accurately measure the air pollutant levels at the edge of Scholl.

19-5

This analysis appears flawed, at minimum and can be misleading. There is no way to tell if any of the emissions, for example, NO<sub>x</sub>, are already exceeding the limit specified by CAAQs, or if the levels will exceed when the new engines are in operation. Overall, the MND air quality section has been written as if there were no residents living near Scholl.

Toxic Air Contaminants (TACs) Are Not Addressed.

There is no mention of toxic air contaminants in the MND. The "Scholl Canyon Landfill Monitoring Report for South Coast Air Quality Management," including the second quarter, 2017, (Sanitation Districts of Los Angeles) reports that **certain toxic air contaminants, such as Benzene, are captured by ambient air monitors on the landfill site and already exceed the OEHHA/ARB approved risk assessment health values for chronic inhalation.** Although we do not know that all of these contaminants come from the landfill, it is likely that they do. Any project placed on the landfill should be studied comprehensively for current TAC levels. This MND should be held to the same standard.

19-6

Finally, it seems obvious that the City of Glendale has a plan to build an integrated set of waste management projects on the Scholl Canyon Landfill. The biogas project would be followed in short order by an anaerobic digestion system linked to the new power generation equipment, and the now tabled expansion project would come into play. These projects are not independent any more than moving power stations from Grayson to Scholl makes them independent actions. Why have these projects been separated for their environmental impact analyses? They will have significant cumulative effects.

19-7

The City of Glendale would be better served and would regain the trust of its residents if it were more transparent about its plans, discussed the cumulative environmental and health effects of their planned projects, and involved the public from the beginning.

19-8

Very truly,

*Dr. David Choi*

Dr. David Choi *M&J*

**From:** [Marie Freeman](#)  
**To:** [Joe. Dennis](#)  
**Subject:** notification list for Scholl Canyon projects  
**Date:** Tuesday, October 17, 2017 11:19:43 AM

---

Dear Mr. Joe,

I am a resident of Glendale and a member of the Board of Directors of the Glenoaks Canyon Homeowners Association. Please place my name on the list of those to be notified 10 days or more in advance of public hearings or meetings or publications of studies or projects involving the Scholl Canyon Landfill. This would include hearing(s) regarding the "Biogas Renewable Generation Project."

20-1

Thank you for your assistance,  
Marie Freeman  
818-500-1828  
2531 Gardner Place, Glendale, CA 91206

**From:** [Marla Nelson](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Public Hearing Scholl Canyon Biogas  
**Date:** Tuesday, October 17, 2017 1:47:54 PM

---

Hi Mr. Joe,

Please add me to any list that may be made for notification of the  
Public Hearing on Biogas Plant at Scholl Landfill.

Thank you,  
Marla Nelson

21-1

**From:** [Nancy Robbins](#)  
**To:** [Joe. Dennis](#); [eapd.la@gmail.com](mailto:eapd.la@gmail.com); [Nancy Robbins](#)  
**Subject:** School Canyon Dump  
**Date:** Tuesday, October 17, 2017 11:12:58 AM

---

I am writing to tell you of my opposition to the proposed plan to create a methane burning plant at the Scholl Canyon Dump. I have been a resident of Eagle Rock for over forty years. I love my community, from the time it was, "Where is Eagle Rock?" to, "Oh, so you live in Eagle Rock!!!" 22-1

I live on Hill Drive, not too far from Eagle Rock Park, and the Figueroa Street access to Glendale's Scholl Canyon Dump. I pay a higher fire insurance premium than my neighbors who live on the south side of the street, because, I was told, I live in a fire zone. LAFD sends me notices annually about brush clearance on my property.

I recall, years ago, when a large brush fire was burning out of control on the north side of the 134 Freeway. Seven fire trucks were parked in front of my home, and the heroic firefighters told me to prepare to evacuate my young family and my pets. As we waited in my car, the winds shifted direction, and fortunately, we did not have to leave. The horrific sight and sound of the fire will stay with me forever, and I know how lucky we were.

The people in northern California are not so lucky as we were that night.

The hillside surrounding the Scholl Canyon Dump is natural, and is very susceptible to wildfires. Is the City of Glendale planning to keep a fire station manned 24/7 with a team of firefighters there to protect the area? And what about the fault that is below our community? And the unhealthful situation that a methane plant would create? 22-2  
22-3  
22-4

I respectfully request that you abandon this thoughtless plan. 22-5

Nancy E. Robbins  
1335 Hill Drive  
Los Angeles, CA 90041





# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

23

SENT VIA E-MAIL AND USPS:

October 17, 2017

[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dennis Joe, Planner

City of Glendale – Community Development Department

633 East Broadway, Room 103

Glendale, CA 91206

## Mitigated Negative Declaration (MND) for the Proposed Biogas Renewable Generation Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing landfill gas collection system and construct and operate an approximately 12-megawatt power generation facility that would utilize landfill gas as a fuel to generate renewable energy (Proposed Project).

### SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant and that the Proposed Project's operational emissions of NO<sub>x</sub> and VOCs would be offset through the allocations from the SCAQMD Priority Reserve Credits<sup>1</sup>. The Lead Agency stated that "since construction and operation of a landfill gas processing facility is considered to be an essential public service, Priority Reserve credits are expected to be granted for this Project pursuant to SCAQMD Rule 1309.1 for pollutants that exceed small source thresholds"<sup>2</sup>.

### SCAQMD Staff's Comments

SCAQMD staff has comments about the air quality cumulative impacts analysis, energy input rating, compliance with SCAQMD Rules, and SCAQMD permits. Comments are provided as follows.

#### *Air Quality Cumulative Impacts Analysis*

The Lead Agency considered the potential cumulative air impacts from the Grayson Power Plant Repowering project<sup>3</sup>. However, the Lead Agency did not consider how the Proposed Project's air quality impacts would be cumulatively affected when it is combined with the air quality impacts from the proposed Scholl Canyon Landfill Expansion project (SCH No. 2007121023). In the cumulative impacts analysis for noise, the Lead Agency found that the proposed Scholl Canyon Landfill Expansion project could cumulatively affect a nearby sensitive receptor for noise exposures<sup>4</sup>. Similarly, the Lead Agency found that implementation of the Proposed Project may overlap with implementation of the proposed School Canyon Landfill Expansion project causing an incremental cumulative increase in vehicle traffic at the intersections of Figueroa Street and Highway 134 ramps<sup>5</sup>. Therefore, to be consistent with cumulative impact analyses for noise and transportation and traffic, SCAQMD staff recommends that the

<sup>1</sup> MND. Page 3.3.17

<sup>2</sup> MND. Page 3.3.13.

<sup>3</sup> MND. Page 3.19.3.

<sup>4</sup> MND. Page 3.19.5

<sup>5</sup> MND. Page 3.19.6.

Lead Agency disclose the potential incremental impacts on air quality from the proposed School Canyon Landfill Expansion project in the Final MND.

#### *Energy Input Rating*

The criteria and toxic emissions from the Internal Combustion Engines/Cogeneration system (ICE/Cogens) is based on an energy input rating of 26.34 mmbtu/hr<sup>6</sup> even though the manufacturer's specified maximum energy input is rated at 23.9 mmbtu/hr<sup>7</sup>. Additionally, the total greenhouse gas emissions of 48,427 MT/year<sup>8</sup> of CO<sub>2</sub>e was based on the input rating of 95.14 mmbtu/hr, which was about four times the manufacturer's rating of 23.9 mmbtu/hr per engine. SCAQMD staff recommends that the Lead Agency revise the Air Quality analysis by using one energy input rating consistent throughout the Final MND and associated appendices.

#### *Compliance with SCAQMD Rules*

##### Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing

Since the Proposed Project includes the abandonment of existing landfill gas pipeline from Scholl Canyon Landfill to Grayson Power Plant, SCAQMD staff recommends including a discussion to demonstrate compliance with Rule 1149 in the Final MND.

##### Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

The scope of work and asbestos survey at this time indicates that the existing temporary/portable offices and landfill condensate/groundwater collection systems will not be disturbed, therefore are not included in the pre-demolition asbestos survey. If plans change and any of these facilities are renovated or demolished, the asbestos survey<sup>9</sup> will need to be amended to include any additional structures or facility components. A 10-working day notification before any demolition or renovation activities other than emergency demolition or renovation is required pursuant to Rule 1403.

##### Rule 1150.1 – Control of Gaseous Emissions From Municipal Solid Waste Landfills

Since the Proposed Project involves demolition and construction of a landfill gas combustion system, SCAQMD staff recommends that the Lead Agency ensure that the Proposed Project is consistent with the Rule 1150.1 Alternative Compliance Plan.

##### California Code of Regulation Title 13, Division 3, Chapter 9, Article 5 – Portable Engine and Equipment Registration

Portable equipment brought onsite must be registered with California Air Resources Board under the Portable Equipment Registration Program (PERP) and may not reside on the facility for greater than one year without a Permit to Operate from SCAQMD. Notification to SCAQMD of PERP equipment is required.

#### *SCAQMD Permits*

Based on SCAQMD staff's review of the MND, it is foreseeable that Lead Agency will rely on the adopted MND to demonstrate CEQA compliance for the Proposed Project's permits from SCAQMD. Therefore, it is critical that the information in the permit applications filed with SCAQMD for the Internal Combustion Engines/Cogeneration system (ICE/Cogens) and associated Selective Catalytic Reduction equipment are consistent with the assumptions used in the Air Quality analysis in the MND. Moreover, since SCAQMD permits are required, SCAQMD should be identified as a Responsible Agency for the

<sup>6</sup> Appendix A.2.3. Page 364.

<sup>7</sup> Page 377.

<sup>8</sup> Table 3.7-3. Page 156.

<sup>9</sup> Appendix G – Pre-Demolition Asbestos and Lead-Based Paint Survey

Dennis Joe

October 17, 2017

Proposed Project in the MND. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. For any questions on permits, please contact Mr. Ken Matsuda, Senior Air Quality Engineer, at [KMatsuda@aqmd.gov](mailto:KMatsuda@aqmd.gov) or at (909) 396-2656.

23-7

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

23-8

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

LAC170912-01

Control Number



**From:** [Brian Bard](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Glenoaks Canyon Biogas Comment  
**Date:** Friday, October 20, 2017 10:16:19 AM  
**Attachments:** [Glenoaks Canyon Biogas Comment.pdf](#)  
[ATT00001.htm](#)

---

Dear Mr. Joe,

Please accept the attached letter, in PDF form, in comment to the Glenoaks Canyon Biogas Proposal.

Regards.  
Brian Bard

-----  
[brian.db@designr.com](mailto:brian.db@designr.com)  
818.956.8556 phone  
818.653.8952 cell/vm

-----  
"Journalism is printing what someone else does not want printed. Everything else is public relations." — George Orwell

October 18, 2017

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 24-1
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 24-2
3. The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. 24-3

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 24-4
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. 24-5

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located. 24-6

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. 24-7

**Indemnification**

1. The City must take responsibility for indemnifying the residents against all past and future losses including, but not limited to: health effects, loss of use, loss of enjoyment, and loss of resale value. 24-8

Best regards,  
Brian Bard  
2351 Pennerton Dr.  
Glendale, CA 91206

**From:** [Celine](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Stop Power plant  
**Date:** Wednesday, October 18, 2017 1:34:57 AM

---

25

Dear Mr Dennis Joe,

Please help stop the construction of a POWER PLANT on our hillsides. We can not allow the plant to continue past it's set closure date. Already we are being poisoned with the smell of the plant in the chemicals they pour on it daily.

**Air Quality:**

The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO2, CO, VOC, and PM2.5). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. This is a violation!!!

The Mitigated Negative Declaration (MND) does not factor in the emissions from the current landfill

**Hazards:**

Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove risky to residents if there is an explosion and rapid spreading fire.

**Geology:**

There are several fault lines within close proximity to the proposed generator. There is the danger of gas and water pipe breakage during an earthquake at the Lower Scholl Canyon Park, the location of the proposed gas link. Children play at this park.

There are homes as close as 100 yards from this park and a regularly used children's baseball field within 200 yards.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

I'm disheartened by all of this; can't believe you tried to sneak this by us by listing the project simply by the address instead of the site name.

Please help stop this monstrosity!!!!

Thank you  
Celine Abrahams

25-1

25-2

25-3

25-4

25-5

25-6

25-7

25-8

25-9





October 18, 2017

Mr. Dennis Joe, Planner  
City of Glendale  
Community Development Department  
633 East Broadway, Room 103  
Glendale, California 91206

◦Established 1955◦

Dear Mr. Joe;

We appreciate the opportunity to comment on the "Biogas Renewable Generation Project" MND. It was unfortunate that our homeowners association did not receive notice of the document's publication until almost three weeks after the fact. We could have informed ourselves and our neighbors more fully of the project's parameters and its implications for our community.

**It is our position that the MND for the Biogas Renewable Generation Project (BRG) underestimates the project's potential negative impacts. In addition, the cumulative effects of three closely related projects have not been adequately considered in this MND. Because issuing an MND truncates the CEQA process, CEQA's "legal standards reflect a preference for requiring an EIR to be prepared." (*Mejia v. City of Los Angeles* (2005) 130 Cal. App.4th 322, 332). This MND is not as complete and comprehensive as possible to substantiate an argument that the stated mitigation measures are adequate.**

CEQA requires that environmental review documents analyze "the whole of an action" (CEQA Guidelines, 15378) and not evade comprehensive CEQA analysis by splitting projects into separate pieces for purposes of environmental review. "One way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project." [*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonoma* (2007)]. The Biogas Renewable Generation Project relies on the gas produced by Scholl Canyon Landfill to operate. The City cannot evade full CEQA review of the Biogas Project by segmenting review of this component of the Scholl Canyon Landfill Expansion.

- The DEIR for landfill expansion is still on the table. Even if the request for 180 feet of additional height is not approved, the operating landfill will continue to grow at about the present rate, at least 800-1000 tons per day. Current licensure approves 3400 tons per day. Greenhouse gas emissions will not decrease; they will increase.
- An anaerobic digestion operation has been in the planning stages since 2013, alongside the BRG project for the landfill. Waste Resources, Inc. and Organic Waste Systems have been granted an exclusive negotiating agreement for a joint venture to

develop this project. Anaerobic digesters produce methane, and we assume that methane would enter the BRG methane-to-electricity operation.

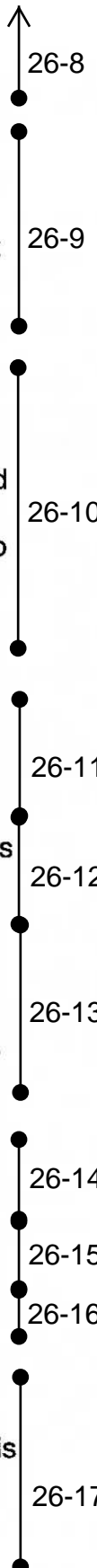
- Repowering the Grayson Power Plant is no less tied to the BRG project. Under the repowering plan, methane from the landfill, as well as from conversion technologies such as anaerobic digestion, would be processed through equipment five miles away on the landfill rather than on the Grayson site. The Scholl Canyon power plant project was originally an important part of the Grayson Repowering Project. We question why they are being evaluated separately.

The MND presents the BRG project as though it were relatively isolated from the landfill, from other waste management plans for Scholl, and from nearby communities such as Pasadena, Eagle Rock, and La Canada and from neighborhoods including Glenoaks Canyon, Chevy Chase Canyon/Estates, Linda Vista, Rancho San Rafael, and facilities such as the Rose Bowl complex, Cal Arts, Dahlia Elementary School, Glenoaks School, Adventist Hospital — the list of sensitive receptors within one or two miles is long in this fully developed, middle and upper middle class residential and recreational area. The MND does not adequately take the nature of the surrounding area into account.

The impacts of the proposed project on air quality raise serious issues. The air quality measures do not consider the cumulative effects of landfill expansion, changes at Grayson, or the possibility of a conversion technology such as anaerobic digestion on a solid waste municipal landfill. The MND reveals criterion air pollutants (NO<sub>2</sub>, CO, VOC, PM<sub>2.5</sub>) in excess of the amounts allowed by SCAQMD. How do the offset credits for this project tie into the Grayson project, or are they part of the same thing? Credits traded on paper do not remove pollutants from the air people breathe near the landfill. The earlier expansion project's DEIR concluded that expansion would create "significant adverse air quality even with mitigation." Therefore, with added pollutants from the power plant, there appears to be substantial evidence to support a fair argument that the project may have adverse environmental impacts (Public Resources Code 21151) and an EIR would be justified.

The project may have aesthetic impacts that are not addressed. The Rim of the Valley Corridor Preservation Act is important to our association. How will the BRG affect the San Rafael Hills which are included in the legislation? What about the recreational areas adjacent to the landfill: Richard Alatorre Park, Eagle Rock Canyon Trail, Eagle Rock Hillside Park, the Scholl Canyon recreation area, and the Rose Bowl? How will the westward views from Linda Vista in Pasadena be affected?

The MND does not propose adequate mitigation measures for the hazards inherent in the power plant's location on a solid waste municipal landfill. Context matters. This is not a normal location. For about 60 years waste has been dumped into a canyon that is now a mountain of trash. The landfill has never been lined, and for the first 11 or 12 years, there were few if any environmental restrictions, so the site is compromised. "[The significance of an activity may vary with the setting." (CEQA Guidelines 15064





(b).] Due to the location of this site adjacent to schools, recreation areas, hospitals, and residences, the power plant may have significant impacts it might not have if located in a different site. An EIR would provide a more detailed analysis of the site, and courts show a clear preference for resolving doubts in favor of preparing an EIR. (*Architectural Heritage Association v. County of Monterey* (2004); *San Joaquin Raptor/wildlife Rescue Center v. County of Stanislaus* (1996).

26-18

26-19

Although it is not designated as a hazardous waste facility, hazardous material does enter the landfill. The MND does not give an estimate of materials such as hydrocarbons, flammable refuse, poisons, corrosives, asbestos, etc. that probably go undetected into the landfill. Where is/are the hazardous waste holding area(s) in relation to the proposed methane scrubbing and power generating stations? How long do the materials tend to await removal? If there were a fire or earthquake, how would the power plant and Cal Edison's power lines be protected? How will the BRG project ensure that toxic spills do not occur? Will landfill gas treatment and power generation require large amounts of chemicals such as ammonia?

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The MND does not propose adequate mitigation for the possibility of fire. Power plants, power lines, methane, and flaring inherently carry the risks of fire and explosion. Although the surface of the landfill is cleared of vegetation, the surrounding hills and neighborhoods are not, nor are the exposed sides of the landfill where indigenous plants have been replaced by flammable grasses and trees. The proposed 60,000 gallon tank of water which will be used for multiple purposes, does not reduce the risk of fire that could spread to surrounding hills.

26-26

Traffic patterns could be negatively affected. The Los Angeles County Operational Area Disaster Routes identified for the City of Glendale are SR-134, Colorado Boulevard, and Figueroa Street (where Figueroa Street connects to Scholl Canyon Road.) The project may interfere with these routes. If there were an explosion or a fire, the major disaster routes could be compromised. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon, and Linda Vista have very narrow one-way-in-one-way-out streets that could also prove dangerous in case of a major incident at Scholl Canyon.

26-27

**For these many reasons, our association would like to request a full environmental impact study of the Biogas Renewable Generation Project in its total context, including the cumulative effects of expansion, Grayson, and conversion technologies that are intended to depend upon the new power generation equipment. A methane driven power plant should be built with the ultimate intent of closing the landfill, not of developing a gas production industry on Scholl.**

26-28

26-29

Sincerely,

  
Rick Marquis, President  
Glenoaks Canyon Homeowners Association

October 18, 2017

27

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 27-1
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 27-2
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. 27-3

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 27-4
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. 27-5

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located. 27-6

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. 27-7

Best regards, Marla Nelson



**From:** [Martins Aiyetiwa](#)  
**To:** [Oillataquerre, Maurice](#); [Haroutunian, Atineh](#); [Joe, Dennis](#)  
**Cc:** [Dave Nguyen](#); [Bahman Hajialiakbar](#); [Julia Weissman](#)  
**Subject:** Scholl Canyon Landfill - Biogas Renewable Generation Project - MND  
**Date:** Wednesday, October 18, 2017 6:00:50 PM  
**Attachments:** [DPW Letter to GWP \(10.10.2017\).pdf](#)

---

Hello Ms. Haroutunian,

Attached is our letter dated October 10, 2017 to Mr. Steve Zurn requesting the City of Glendale to further extend the comment period on the Proposed Mitigated Negative Declaration until thirty days from the date of the letter (i.e. November 10, 2017). Since the current due date for the proposed MND is October 20, we would like to know if a decision has been made regarding our request. Please confirm whether or not the request for extension was granted and what is the due date.

28-1

Thank you.

*Martins Aiyetiwa, P.E.*  
Senior Civil Engineer  
Los Angeles County Public Works  
Phone: (626) 458-3553





MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: **EP-0**

October 10, 2017

Mr. Steve Zurn  
General Manager  
Glendale Water & Power  
141 North Glendale Avenue  
Glendale, CA 91206

Dear Mr. Zurn:

### **SCHOLL CANYON LANDFILL BIOGAS RENEWABLE GENERATION PROJECT PROPOSED MITIGATED NEGATIVE DECLARATION**

On October 3, 2017, Dorine Martirosian of your City Attorney's office contacted Ms. Julia Weissman of the Office of County Counsel to request that the County of Los Angeles Department of Public Works acknowledge that it is aware of the City's proposed Scholl Canyon Landfill Biogas Renewable Generation Project and the City's preparation of a Mitigated Negative Declaration (MND) for the project. We understand that the comment period for this MND originally was set to run from August 31, 2017, through September 30, 2017, and was extended to October 20, 2017.

28-2

After checking our records and making inquiries, Public Works has not been able to locate receipt of any Notice of Intent to Adopt the MND, and was unaware that the City had prepared the MND and released it for public comment until your City Attorney's office contacted our County Counsel regarding this matter. As the owner of property on which the project is proposed to be built and a member of the Joint Powers Authority that governs the operation of the Scholl Canyon Landfill, we believe that it is important for the County to have sufficient time to review the MND and prepare comments and that this opportunity is supported under the California Environmental Quality Act. Therefore, we are requesting that the City further extend the comment period until thirty (30) days from the date of this letter.

28-3



Mr. Steve Zurn  
October 10, 2017  
Page 2

If you have any questions, please contact Ms. Shari Afshari at (626) 458-4008 or [safshari@dpw.lacounty.gov](mailto:safshari@dpw.lacounty.gov).

Very truly yours,

MARK PESTRELLA  
Director of Public Works



SHARI AFSHARI  
Deputy Director

CR:ao

h/adhome/ao/EPD/Scholl Canyon Landfill Mr Zurn

cc: County Counsel (Julia Weissman)  
Sanitation Districts of Los Angeles County (Grace Robinson Hyde)  
Glendale City Attorney (Dorine Martirosian)  
Lewis Brisbois (Claire Hervey Collins)

**Owen & Robin Lewis**

2474 Bywood Drive, Glendale, CA 91206

818 247-0724 olewis@ucla.edu

2017 OCT 20 PM 2:52

LEWIS@UCLA.EDU

October 18, 2017

Mr. Dennis Joe

Glendale Community Development Department Planning Office

633 E. Broadway, Glendale, CA 91206, Rm 103

Dear Mr. Joe

We are residents of Glenoaks Canyon and members of a citizen group formed to oppose any further expansion or industrialization of the Scholl Canyon Landfill. Please accept our comments regarding the City of Glendale's Notice of Intent to Adopt a Mitigated Negative Declaration for the Biogas Renewable Generation Project at Scholl Canyon Landfill.

The Notice appears to be an attempt by the City of Glendale to avoid the scrutiny that an Environmental Impact Review of the Project would bring and is another example of their disregard for the well-being of the residents of communities near the landfill. This project will add more air and noise pollution to a site that is already a blight. Of course, the impact to the immediate environment will be negligible as all measurements for comparison, taken in and around an operating landfill, are high. In addition, cumulative effects after a proposed future expansion of the landfill were not calculated. This course of action is another piecemeal, self-justifying tactic in the City's efforts to accomplish their goal of expansion and further industrial development of the landfill. This project, while part of the City's planned Renewable Energy portfolio and included in the Grayson Repowering Project Simple Schematic, is not part of the Grayson Project Environmental Impact Report. Why not? What is the agenda of City planners? Was this project conceived too late to be included in the GRP EIR? Is this approach the easy way out? Whatever the reason, the Scholl Canyon Biogas Regeneration Project should be included in an amended Grayson Project EIR for consideration by the public.

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The Notice argues that locating a Biogas Regeneration Project at the landfill is the only option since a five-mile pipeline from the Landfill to the Grayson was declared non-compliant under California Environmental Regulations as a pressurized methane vessel. There is, in fact, another option: The Biogas Regeneration equipment should be placed at the Grayson Power Plant site. It can be done for less cost, operate more efficiently and any aspect of the operation of the 4 proposed 3MW Generator Sets that exceeds emissions thresholds in a different setting could be mitigated. The pipeline deficiency could be remedied by either repairing or replacing the pipe-line to bring it into compliance for pressurization as before or by locating the pumps at the Grayson end of the pipeline to eliminate the pressurization issue. We believe the latter is preferable because it does not require the compression of gas in a five-mile long pipeline to build up a head of pressure. Newer, more efficient and less robust pumps could be used, turning the pipeline into a giant straw, drawing landfill gas and creating a slight vacuum in it. Gas treatment and flaring units should be left at the landfill. This is far less costly option, both near and long term, because:

- Fire suppression and domestic water are readily available at the Grayson site so the need to construct a mile-long, 12-inch, water line from the other side of the landfill to feed a new 60,000-gallon tank for new fire suppression infrastructure and a new 10,000-gallon domestic water tank would be eliminated.

- Natural gas is also easily accessible at Grayson, eliminating the need to construct a 2/3 mile-long, 3-inch pipeline to bring natural gas to the location of the generator sets from a Gas Company main at the base of the western end of the landfill.

- Extensive site preparation will be required at Scholl Canyon, including pouring large concrete pads for each of the four generator sets. Only minimal site preparation would be needed at the Grayson site and there appears to be plenty of room in the new plan.

- Power generation would be fed directly into Glendale's electrical distribution system instead of just connecting to a Los Angeles grid. And the existing, old transmission line, which connects to a Southern California Edison sub-station, would not have to be maintained.

- Operating costs will be lower because most monitoring and maintenance duties of the six-person operating staff to be stationed at the Landfill can be spread among Grayson Power Plant staff. Less new infrastructure construction lessens the need for maintenance on those systems and reduces the risk that having a pressurized gas line running across a landfill presents.

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There seems to be no valid reason, except for mistake or calculation, to locate a 12MW Biogas Regeneration project at Scholl Canyon Landfill. The expense, compared to the alternative of having them located at Grayson, cannot be justified by a cost/benefit analysis. Perhaps that is why none has been done. Surely the expert consultants and staff who wrote this proposal have thought of this option. If not, they need to develop their analytical skills. If they have and are misleading in their presentation, then they have violated the public trust and should face consequences. Regardless, the Grayson Repowering Project EIR should be revised to include this project with biogas-powered generators located at the Grayson Plant site. After all, if this project was deemed to have such a small impact on the environment that it doesn't require an EIR then it's inclusion into the Grayson Project should not present an impediment to the approval of the Grayson Project EIR.

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Sincerely,

A handwritten signature in black ink, appearing to read "Owen Lewis/Robin Bissiri-Lewis". The signature is fluid and cursive, with a large initial "O" and "L".

Owen Lewis/Robin Bissiri-Lewis



**From:** [Sue Flocco Glenoaks Canyon](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Save my Neighborhood Please  
**Date:** Wednesday, October 18, 2017 9:26:16 PM

30

October 18, 2017

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Sue Flocco

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**COMMENTS REGARDING THE PROPOSED EXPANSION OF THE SCHOLL CANYON  
LANDFILL, 2017  
GEOLOGIC AND ENVIRONMENTAL HAZARDS**

**OCTOBER 19, 2017**

Clarence A. Hall  
Professor of Geology Emeritus, UCLA  
Licensed Professional Geologist, Certificate Number 2337  
Board for Professional Engineers, Land Surveyors, and Geologists,  
State of California

**INTRODUCTION**

The Scholl Canyon Landfill is currently an environmental hazard owing to: (a) its proximity to an active fault, (b) the presence of hazardous waste in the subsurface, and (c) the absence of a composite liner at the base of the landfill. An expansion of the Scholl Canyon Landfill, e.g., raising the profile of the surface of the landfill 170-180 feet, with contaminants added to the landfill that escape detection, presents a further health risk. Seismic activity could potentially rupture the present subsurface barrier, releasing contaminated fluids into the regional groundwater. In addition, future earthquakes along either proximal or regional faults could damage proposed engineered structures. However, "*The Administrative Draft Initial Study/Mitigated Negative Declaration*, (i.e., Stantec Scholl Canyon Landfill report, July 31, 2017), *Glendale Proposed Biogas Renewable Generation Project, Project documents*, referred to here as **Stantec 2017**, concludes that "potential impacts related to rupture of a known earthquake fault (*referring to the Verdugo fault*) or strong seismic ground-shaking are considered less than significant", and that no mitigation measures are required.

Federal, California State, Los Angeles County, and institutional documents, referenced and referred to below, provide the bases to show that the Scholl Canyon Landfill is currently an environmental hazard. For convenience some references are referred to here as:

**EIR 2003:** 2003 Technical Background Reports City of Glendale CA, Earth Consultants International.

**EIR 2006:** Report: Scholl Canyon Landfill Expansion/Environmental Impact Study August 8, 2006, City of Glendale. EIR 2006.

**SD 2009:** 2009-10 Water Year ULARA Watermaster Report. Scholl Canyon Landfill Expansion EIR. Appendix K.

**EIR 2014:** Scholl Canyon Landfill Expansion, 2014 Draft Environmental Impact Report For The Scholl Canyon Landfill Expansion Volumes 1 & 2, State Clearinghouse No. 2007121023, EIR 2014.

**SD 2016:** First Quarter and Second Quarter 2016 Water Quality Monitoring Report Scholl Canyon Landfill Glendale, California County Sanitation Districts of Los Angeles County 1955

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Workman Mill Road Post Office Box 4998 Whittier, California 90607-4998. April and July 2016.

**SD 2017:** First Quarter and Second Quarter 2017 Water Quality Monitoring Report Scholl Canyon Landfill Glendale, California County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Post Office Box 4998 Whittier, California 90607-4998. April and July 2017.

## **BARRIER, GROUND WATER, HAZARDOUS SUBSTANCES**

**Stantec 2017: Page 3.6.1, "Section 3.6, Geology and Soils" of the "Biogas Renewable Generation Project, Administrative Draft Initial Study/Mitigated Negative Declaration"**  
Subheading: "Regional Geology".

**Last Paragraph:** "California Highway 134 is located approximately 0.4 miles southwest of the site".

**My Comments:** Referring to "approximately 0.4 miles": The entrance and address of the Scholl Canyon Landfill is 7721 Figueroa Street, Los Angeles, CA. The entrance to the landfill is approximately **200 feet** north of the Ventura Freeway (California 134) and the Verdugo fault.

In addition: (a) The current and active part of the landfill, at its southern margin, is **1,500 feet** north of California 134 and the Verdugo fault.

(b) A subterranean barrier (**pages 4 5 & 6 below**) is present near the western boundary of the Scholl Canyon landfill or "site". The barrier is intended to block the westward subsurface migration of over 200 chemicals (see the following table). That barrier is **~2,000 feet** north of California 134 and the Verdugo fault (see accompanying maps and figures).

**Stantec 2017: Page 3.6.2 of the Stantec Report: "Local Geology" Stantec 2017: Page 3.6.1:**

"Based on information depicted on the 2005 Geologic Map of Los Angeles, the Project site is underlain by Mesozoic age quartz diorite deposits (sic)..." "Sometimes (sic) referred to as the Wilson Diorite."

**My Comments:** "the 2005 Geologic map of Los Angeles" (referred to above), apparently refers to the "Preliminary Geologic Map of the Los Angeles 30' x 60' Quadrangle", published by the U.S. Geological Survey, and authored by R.F. Yerkes and R.H. Campbell. These two authors reference maps used in their compilation, including several maps authored by T.W. Dibblee.

The Wilson Diorite is a quartz diorite. It is an igneous intrusive rock—not quartz diorite "deposits". Deposits are sedimentary lithology (e.g. made up of clay, silt, sand, or gravel and commonly carried and deposited by wind, water, or ice). The quartz diorite was not "deposited" by sedimentary processes.

The igneous rocks consist of granodiorite, quartz diorite, and/or tonalite. These are intrusive rocks of late Cretaceous age (100.5–66 Ma) that intruded metamorphic rocks, including gneiss or Mendenhall Gneiss, whose age is Proterozoic or greater than 1.2 billion years old.

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These igneous and metamorphic rocks are present beneath the Scholl Canyon landfill. In a sense, they are an **environmental hazard** owing to the fact that they are highly fractured. During at least the last 28 million years (28 Ma to Present) these rocks were transported tectonically along and within the San Andreas zone, and other fault systems, i.e., transported at least 350 miles or as much as 20 degrees of latitude. During transportation they were highly fractured and mixed. They form the basement of the landfill. See also **EIR 2003: TECHNICAL BACKGROUND REPORT to the 2003 SAFETY ELEMENT CITY of GLENDALE, CALIFORNIA, CHAPTER 2: GEOLOGIC HAZARDS.**

31-8

In sum: In 1961, no impermeable membrane was installed at what was to become the base of the Scholl Canyon Landfill. As noted above, the rocks beneath the base of the landfill are highly fractured igneous and metamorphic rocks largely of two geologic ages (~150 million and 650+ million years or/to 1.2 billion years old) that have been transported and fractured as they were moved at least several hundred miles to their present location, and during at least the last 27 or 28 million years.

**EIR 2014 (part 3.3.7.1):** This section minimizes this environmental hazard: The report states:

"The SCLF was developed and the extent of refuse placement was established prior to Subtitle D regulations requiring installation of a composite liner at the bottom of the landfill. Although the site does not have a composite liner, the existing natural liner of bedrock, the subsurface barrier at the mouth of the canyon, and the groundwater monitoring and extraction systems collectively provide an equivalent level of protection".

**My Comment:** Because there is no "composite liner at the bottom of the landfill" or impermeable barrier beneath the landfill, contaminated fluid has leaked and is currently leaking from beneath the landfill. The contaminated groundwater is carried westward into the aquifer (based on LA County sampling the substrate in wells west of the barrier; see below). **Expansion of the landfill will exacerbate this existing environmental hazard.**

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The following maps and tables, **pages 4-10**, support this comment.

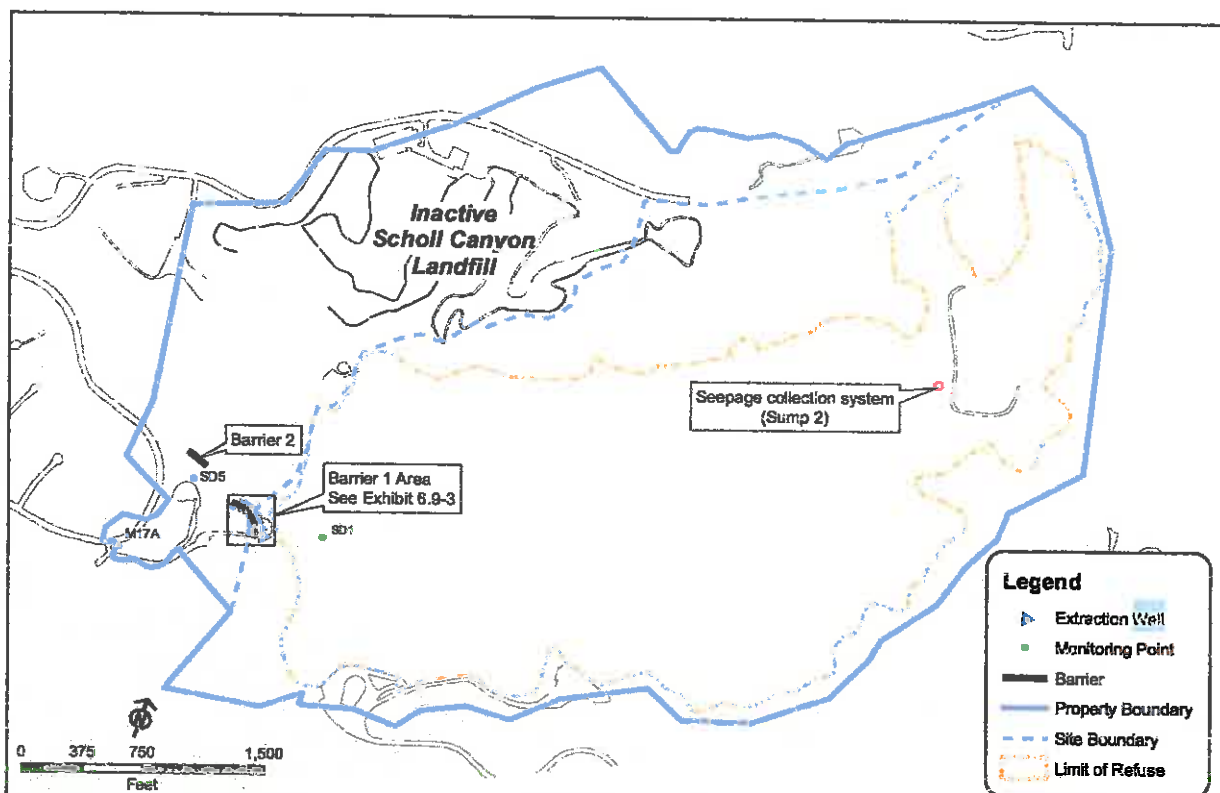
The maps and tables below show the location of the monitoring wells west of the subsurface barrier near the western limit of the Scholl Canyon Landfill, and wells farther west of the barrier at the Glenoaks Park. The presence of chemical elements, and over 200 "constituents of concern", reported from nine monitoring wells (wells M02B, M04B, M05A, M06B, M08B and, M010B) immediately west of the subsurface concrete and bentonite [volcanic ash] barrier, and wells M17A, M18A, and M18B at the Glenoaks Park), clearly demonstrate that the subsurface barrier at the west side of the landfill, and mouth of the canyon, and the groundwater monitoring and extraction systems clearly do not provide protection from environmental hazards owing to: (a) the absence of a composite liner at the base of the landfill, (b) the presence at the base of the landfill of highly fractured igneous and metamorphic rocks that allow hazardous substances to migrate westward beneath the barrier,

and (c) the potential for earthquakes to generate faults (discussed below) that could breach the subsurface barrier.

In addition, rainfall (see rainfall averages for Los Angeles below) eventually percolates downward through the landfill and into: (a) the fractured substrate, (b) the aquifer, groundwater, and (c) Glendale's water wells. Increased rainfall exacerbates percolation of chemical constituents into the groundwater.

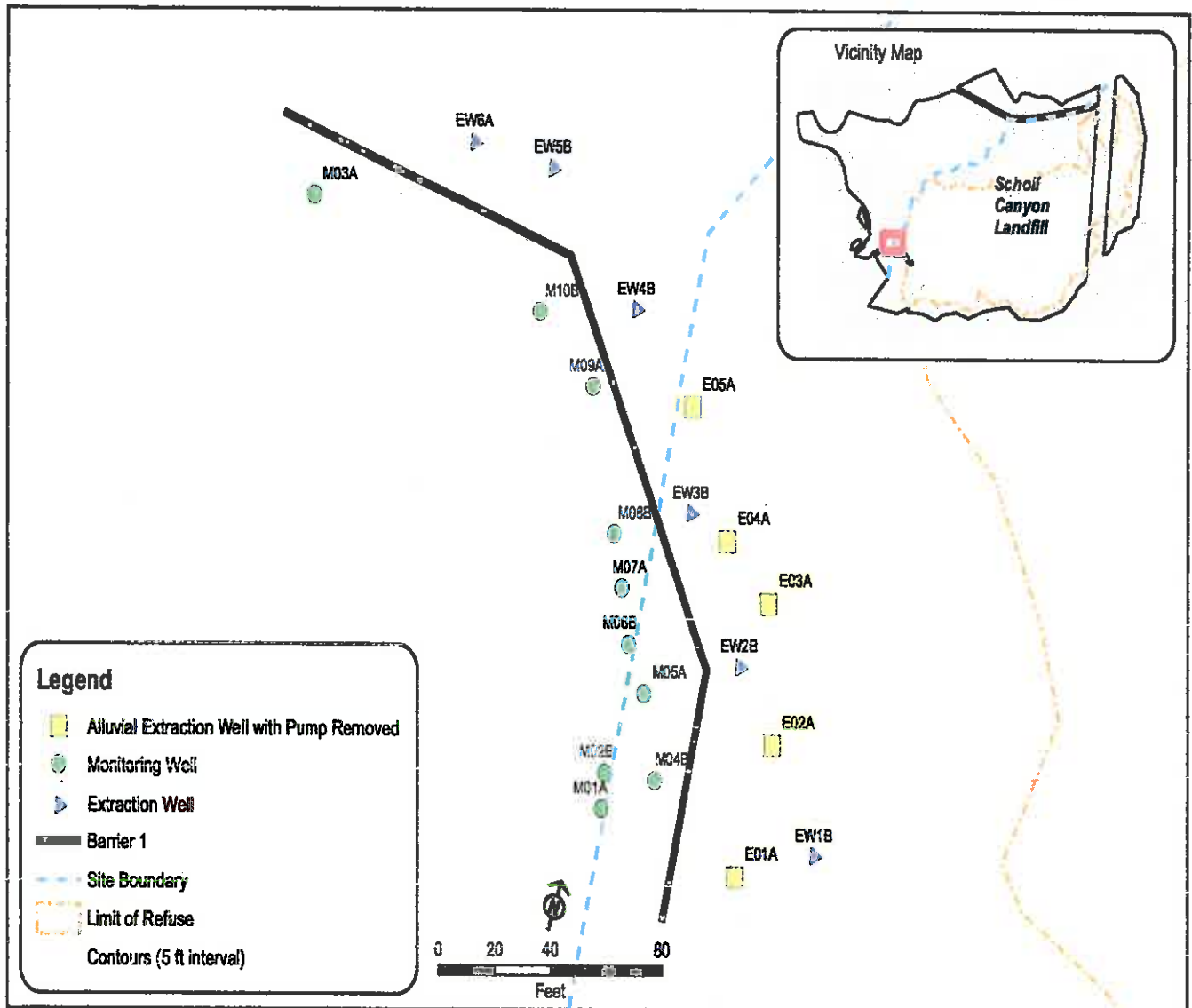
Five-year Average	9.82 INCHES		
Ten-year Average	11.70 INCHES		
Twenty-year Average	13.56 INCHES		
Fifty-year Average	14.69 INCHES		
Years from 2016 to 1966			

Note: These rainfall averages are for Los Angeles, CA. The average annual Precipitation for Glendale is 18.96 inches, owing to its proximity to the surrounding mountains and its higher elevation than Los Angeles. A hundred-year-plus data record is available for Los Angeles (average 14.93 inches), but not for Glendale.



Source: County Sanitation Districts of Los Angeles County

**Figure 6.9-2**  
**Monitoring Point Locations**  
**Scholl Canyon Landfill Expansion EIR**



Source: County Sanitation Districts of Los Angeles County

**Figure 6.9-3**  
**Subsurface Barrier 1 System**  
 Scholl Canyon Landfill Expansion EIR

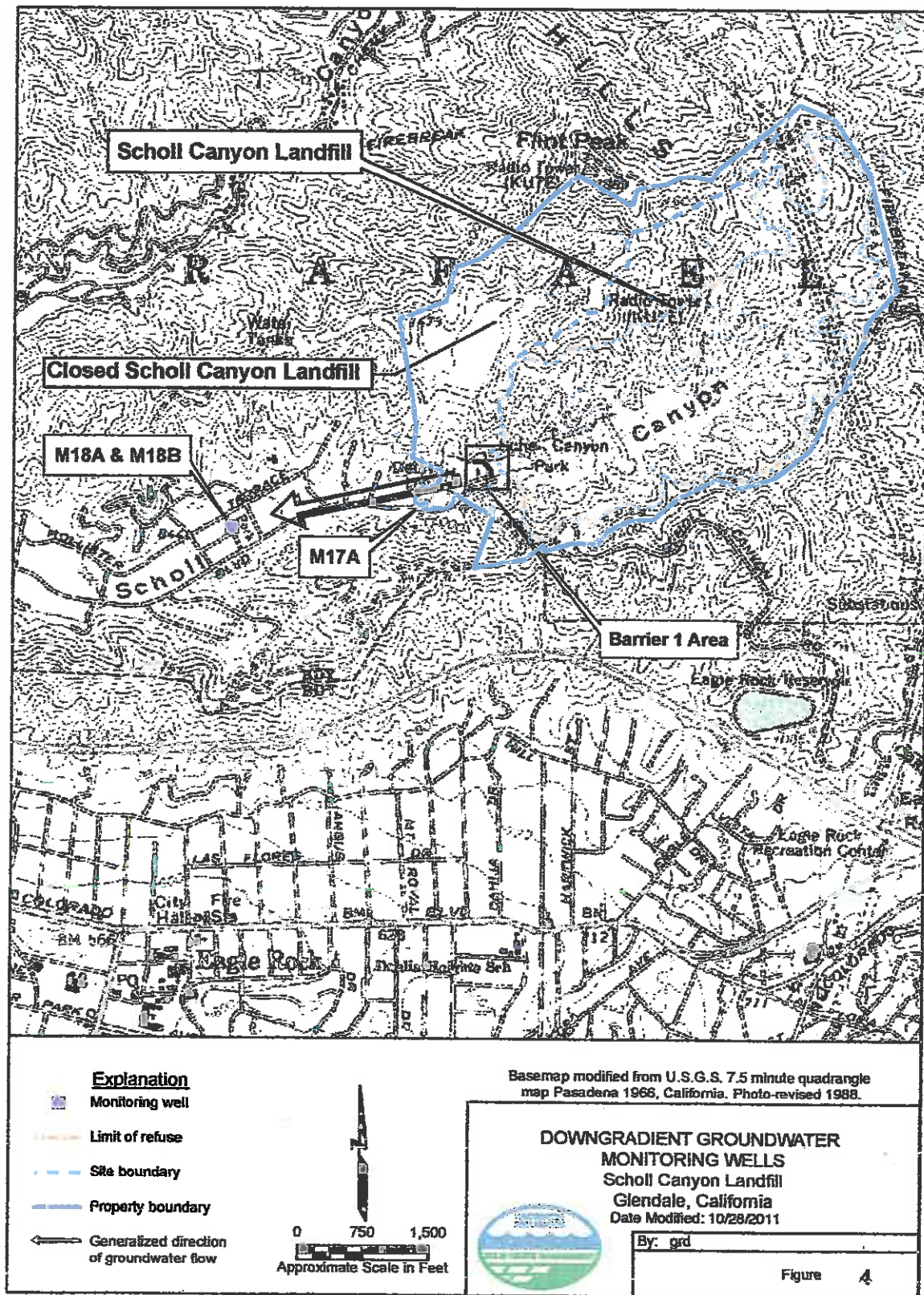




Table 3  
Schell Canyon Landfill Constituents of Concern[illegible]







## SD 2017: Trichloroethene

“Trends for the volatile organic compounds (VOCs) were generally consistent with previous results of trend analyses performed for quarterly monitoring events at the SCLF. For the most part, the observed VOC concentrations have decreased or remained stable at most wells. Such trends have been apparent since the installation of the new groundwater extraction wells in 1998. Trend analyses indicate decreasing or stable trends for all the detected VOCs at wells M06B and M08B, for five of the six detected VOCs at wells M02B, and for four of the five detected VOCs at well M04B. Trichloroethene at wells M02B and M04B was identified as showing increasing trends; these wells and trends are discussed below.

### *Well M02B*

Six of the 10 selected VOCs were detected in well M02B during the reporting period and one increasing trend was identified. **The statistical analyses indicated an increasing trend for trichloroethene. This VOC was detected at 7.4 and 7.6 µg/L in the primary and duplicate samples, respectively, during this reporting period. Trichloroethene has been detected since the third quarter of 1987 and concentrations have ranged from non-detect to 8.5 µg/L.** There are typical indicators of leachate in groundwater such as chloride, nitrate as nitrogen, sulfate, total organic carbon, and total dissolved solids. The concentrations of these indicators at well M02B do not show changes that would correspond with a new release from the landfill.

### *Well M04B*

#### ***Second Quarter 2017 Water Quality Monitoring Report Scholl Canyon Land***

Five of the 10 selected VOCs were detected in well M04B during the reporting period and one increasing trend was identified. **Although the statistical analyses indicated an increasing trend for trichloroethene, this VOC was detected within its historical levels this reporting period at 2.7 µg/L. Trichloroethene has been detected since the first quarter of 1991 and concentrations have ranged from non-detect to 7.5 µg/L.** The detected concentrations of this VOC do not show a steady increase as suggested by the trend analysis, but instead fluctuates from one monitoring event to the next within a band of values.

The Sanitation Districts do not believe these detected trends require any necessary action beyond the site's existing CAP. A discussion of the year's concentration trends at the monitored wells will be included in the 2017 annual water quality monitoring report. In all of the monitoring wells, total VOC concentrations have decreased significantly since the bedrock extraction wells were installed. **These results indicate that the (corrective action program) CAP continues to be effective in controlling landfill-affected groundwater.”**

**My Comments:** There should be public concern owing to the presence of trichloroethylene (TCE) west of the concrete and bentonite barrier.

*From Wikipedia, the free encyclopedia:*

"Pioneered by Imperial Chemical Industries in Britain, its development was hailed as an anesthetic revolution. Originally thought to possess less hepatotoxicity than chloroform, and without the unpleasant pungency and flammability of ether, TCE use was nonetheless soon found to have several pitfalls. These included promotion of cardiac arrhythmias, low volatility and high solubility preventing quick anesthetic induction, reactions with soda lime used in carbon dioxide absorbing systems, prolonged neurologic dysfunction when used with soda lime, and evidence of hepatotoxicity as had been found with chloroform.

The introduction of halothane in 1956 greatly diminished the use of TCE as a general anesthetic. TCE was still used as an inhalation analgesic in childbirth given by self-administration. Fetal toxicity and concerns for carcinogenic potential of TCE led to its abandonment in developed countries by the 1980s.

Due to concerns about its toxicity, the use of trichloroethylene in the food and pharmaceutical industries has been banned in much of the world since the 1970s. Legislation has forced the substitution of trichloroethylene in many processes in Europe as the chemical was classified as a carcinogen carrying an R45 risk phrase, *May cause cancer*. Many degreasing chemical alternatives are being promoted such as *Ensolv* and *Leksol*; however, each of these is based on *n*-propyl bromide which carries an R60 risk phrase of *May impair fertility*, and they would not be a legally acceptable substitute.

Groundwater contamination by TCE has become an important environmental concern for human exposure.

In 2005 it was announced by the United States Environmental Protection Agency that the agency had completed its Final Health Assessment for Trichloroethylene and released a list of new TCE toxicity values.<sup>[6]</sup> The results of the study have formally characterized the chemical as a human carcinogen and a non-carcinogenic health hazard. **A 2011 toxicological review performed by the EPA continues to list trichloroethylene as a known carcinogen."**

## BARRIER, FAULTS

**Stantec 2017: Section 3.6.3 states:** "The project site is not located within a currently mapped California Earthquake fault zone, as presented in the table above; the nearest fault is the Verdugo fault, located 0.3 miles to the southwest of the project site (italics/underline mine). Based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Project site during design life of the proposed development.

The Scholl Canyon faults were mapped by Byer (1968), and Envicom (1975) suggested that this fault connects the Verdugo fault in the west to the Eagle Rock fault in the east. However, more recent mapping by Dibblee (1989) does not even show these faults, and there is (sic) no data to indicate that these fault traces, if even present, are active. The Hazards Map in the GGP (Glendale General Plan) shows the Scholl Canyon fault, as mapped by Byer, on Plate P of the Safety Element of the GGP (City of Glendale, 2003)." End quote.

**My Comments:** Stantec 2017 minimizes the importance of the Verdugo fault. To quote from above: **"there is low potential for surface fault rupture from the Verdugo Fault"**. Because movement within and along the Verdugo fault zone (and along faults mapped within the Scholl Canyon Landfill) could impact any engineered structures at the landfill site, and elsewhere, including the subsurface barrier discussed in my above comments, evidence of the presence of the Verdugo fault, the postulated magnitude of an earthquake near the trace of the Verdugo fault, and the estimated monetary damage that movement along the fault could cause, the Verdugo fault is reviewed below.

**BELOW: Some maps depicting the Verdugo Fault**

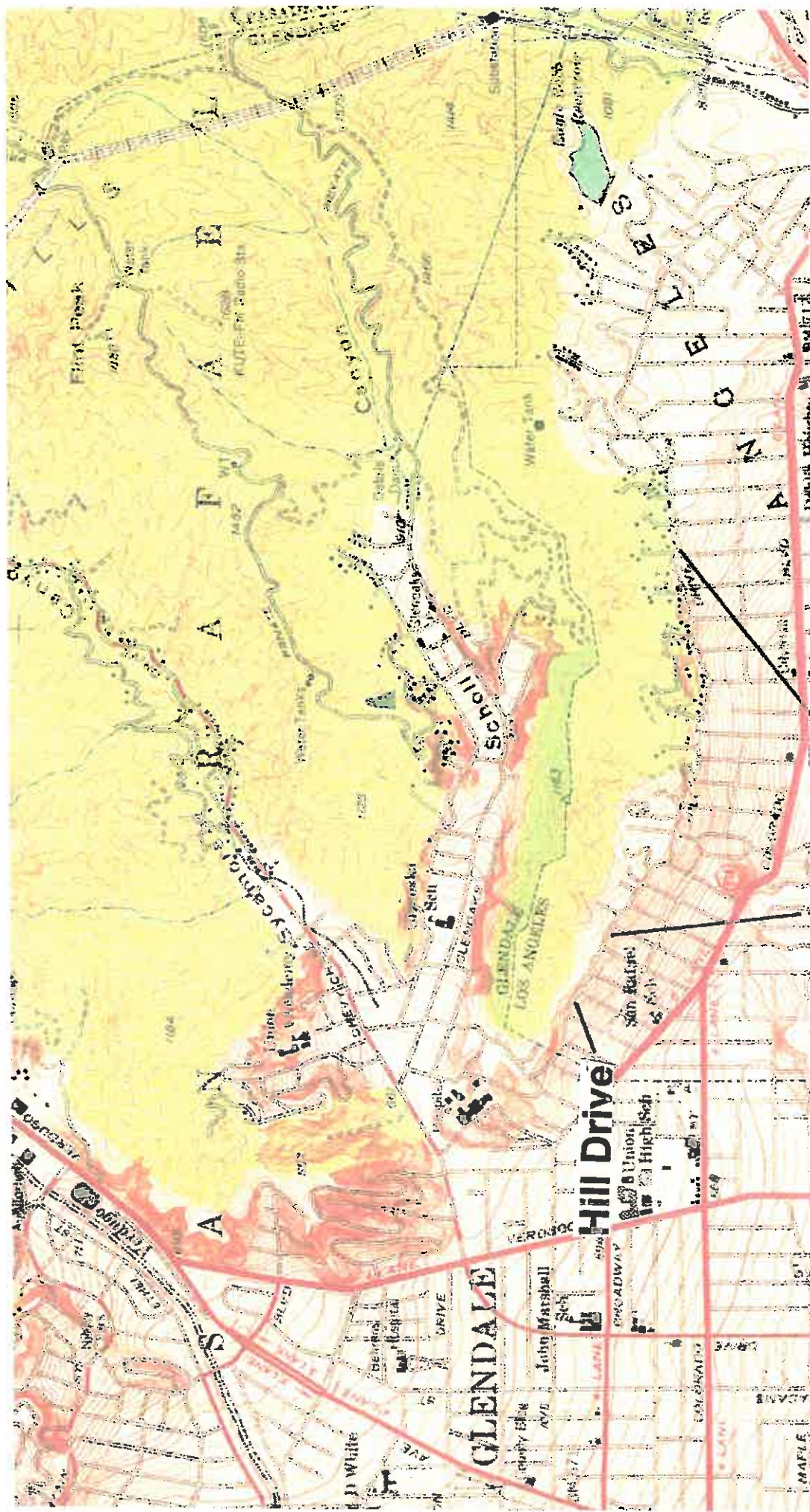
**1. TOPOGRAPHIC MAP (Page 13)**

The Verdugo fault or fault-line scarp is visible on the **1953 edition** (pre-Ventura Freeway, CA 134) of the **7.5 minute Pasadena Quadrangle**. A part of that map is reproduced below. The fault scarp, before excavation for the freeway was along "Hill Drive" (**Page 13**).

**2. GEOLOGIC MAPS (Beginning on Page 14)**



# Scholl Canyon (Glenoaks Canyon) Pasadena Quadrangle 1958



Fault Scarp (Verdugo fault)



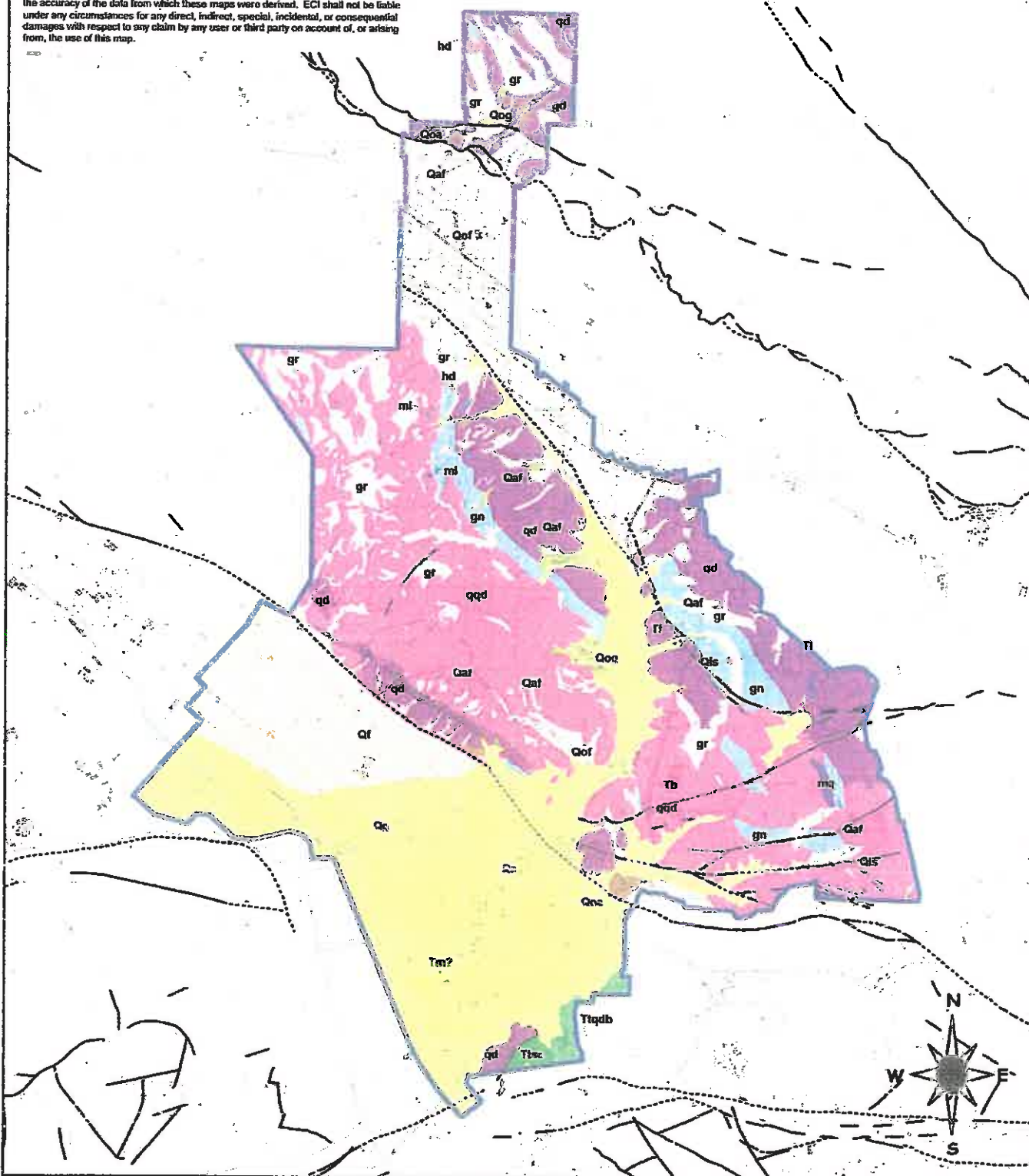
sufficient to serve as a substitute for detailed geologic investigations of individual sites, nor does it satisfy the evaluation requirements set forth in geologic hazard regulations.

Fault lines on the map are used solely to approximate the fault location. The width and location of the faults should not be used in lieu of site-specific investigations, evaluation, and design.

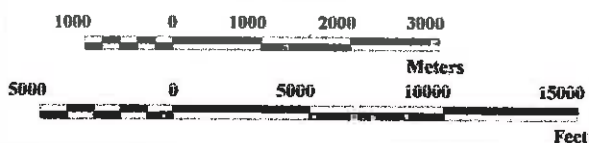
Detailed geologic investigations, including trenching studies, may make it possible to refine the location and activity states of a fault. All faults may not be shown. This map should be amended as new data become available and are validated.

Earth Consultants International (ECI) makes no representations or warranties regarding the accuracy of the data from which these maps were derived. ECI shall not be liable under any circumstances for any direct, indirect, special, incidental, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of this map.

14



Scale: 1:60,000



Base Map: USGS Topographic Map from Sure!MAPS RASTER  
Sources: Weber, 1980; Dibblee, 1989a, 1989b, 1991a, 1991b, 2002; Rubin, 1992; Yerkes, 1997; Yerkes and Graham, 1997; Dyer, 1988.



Project Number: 2103

**Geologic Map**  
**Glendale, California**

**Plate**  
**2-1**

The preceding geologic map was compiled by the following:

Byer, J.W., 1968, Geologic map of a part of the San Rafael Hills: Unpublished map prepared for the City of Glendale (*according to Weber et al. 1981*).

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1989, Geologic map of the Los Angeles quadrangle, Los Angeles County, California: Dibblee Geological Foundation Map DF-22, scale 1:24,000.

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1989, Geologic map of the Pasadena quadrangle, Los Angeles County, California: Dibblee Geological Foundation Map DF-23, scale 1:24,000.

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1991, Geologic map of the Sunland and Burbank (north 1/2) quadrangles, Los Angeles County, California: Dibblee Geological Foundation Map DF-32, scale 1:24,000.

Weber, F.H., Jr., Bennett, J.H., Chapman, R.H., Chase, G.W., and Saul, R.B., 1981, Earthquake hazards associated with the Verdugo Eagle Rock and Benedict Canyon fault zones, Los Angeles County, California, U.S. Geological Survey, Open-file report No. 81-296, 173 p.

Yerkes, R.F., 1997, Preliminary geologic map of the Los Angeles 7.5-minute quadrangle, southern California, Open-file Report 97-254.

Yerkes, R.F., 1997, Preliminary geologic map of the Burbank 7.5-minute quadrangle, southern California, Open-file Report 97-166.

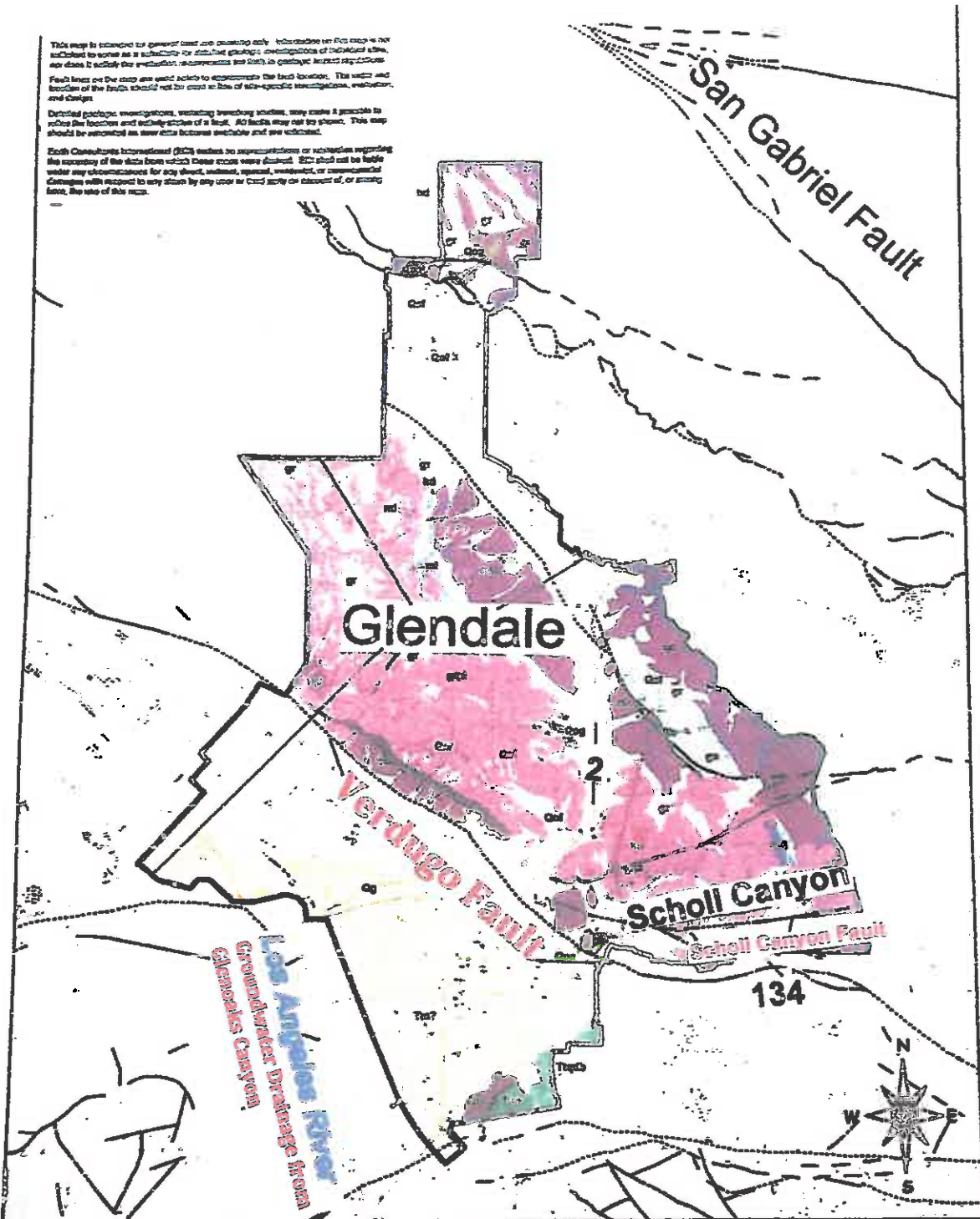
Yerkes, R.F., 1997, Preliminary geologic map of the Hollywood 7.5-minute quadrangle, southern California, Open-file Report 97-255.

This map is intended for general use and is primarily for informational purposes. Information on this map is not sufficient to serve as a substitute for detailed geologic investigations of individual sites, nor does it satisfy the evaluation requirements for data in geologic hazard investigations.

Each line on the map is used solely to approximate the fault location. The width and location of the fault should not be used as data in site-specific investigations, evaluation, and design.

Detailed geologic investigations, including trenching studies, may make it possible to refine the location and characteristics of a fault. All faults may not be shown. This map should be interpreted as an approximation of the available data and not as a definitive statement.

Each Contributor International (CCI) makes no representations or warranties regarding the accuracy of the data from which these maps were derived. CCI shall not be held liable under any circumstances for any direct, indirect, special, incidental, or consequential damages with respect to any claims by any user or third party on account of, or arising from, the use of this map.



Scale: 1:60,000



Base Map: USGS Topographic Map from SureMAPS RASTER  
Sources: Weber, 1980; Dibble, 1989a, 1989b, 1991a, 1991b, 2002; Rubin, 1982; Yerkes, 1987; Yerkes and Graham, 1987; Byer, 1988.



**Geologic Map**  
**Glendale, California**

Plate  
2-1



# GEOLOGIC UNIT DESCRIPTIONS

## Surficial Sediments

Quaternary	Holocene	Qaf	Artificial fill	
		Qg	Stream channel deposits of gravel, sand and silt.	
		Qa	Alluvium; unconsolidated floodplain deposits of silt, sand and gravel.	
		Qf	Alluvial Fan	
		Qls	Mapped Landslide	
Pleistocene	~1 TO ~2 MILLION YEARS	Older Dissected Surficial Sediments		
		Qss	Remnants of older weakly consolidated alluvial deposits of gravel, sand and silt.	
		Qof	Alluvial fan gravel and sand derived from San Gabriel Mountains; includes some Qg and Qa in northern areas.	
		Qog	Elevated remnants of alluvial gravel and fanglomerate deposits, weakly indurated; in San Gabriel Mountain foothills partly weathered reddish; in that area may locally include Pacoima and Saugus Formation of Smith (1986).	
		Monterey Formation		
Tertiary	~11 TO ~23 MILLION YEARS	Tm?	White-weathering, thin bedded, platy siliceous and semi siliceous rocks.	
		Topanga(?) Formation		
		Ttqcb	Gray to brown breccia, massive to vaguely bedded, composed of angular detritus and a few rounded cobbles and boulders, all of biotite hornblende quartz diorite.	
		Tts	Light gray to brown, semi-friable sandstone, and interbedded brown sandy to silty shale, semisiliceous shale, and pebble-cobble conglomerate of quartz diorite detritus; Luisian(?) stage.	
		Dike Rocks		
		Tb	Thin dikes of black to brown, fine-grained basaltic to andesitic intrusive rocks.	
		Ti	Thin dikes of light gray latite porphyry.	

## Granitic Rocks

gr

Gray-white, medium- to fine-grained massive granitic rock mostly of quartz monzonite and granodiorite composition; composed essentially of quartz, plagioclase feldspar (oligoclase), K-feldspar (mostly microcline) and minor biotite.

## Quartz Diorite



Gray, medium-grained quartz diorite to diorite, massive, non-gneissoid quartz diorite composed essentially of plagioclase feldspar (oligoclase-andesine, hornblende, biotite, and minor quartz); incoherent where weathered.



Gray, medium-grained quartz diorite to diorite, massive to gneissoid quartz diorite, composed essentially of plagioclase feldspar (oligoclase-andesine, hornblende, biotite, and minor quartz); incoherent where weathered.

## Hornblende-Diorite



Dark gray, massive to locally gneissoid, medium-grained diorite-gabbro composed of hornblende and plagioclase feldspar (andesine); locally includes lenses of hornblende-rich layered gneiss.

## Siliceous Metamorphic Rocks



Gray, banded fine-grained siliceous rock; probably metaquartzite or metachert.

## Gneissic Rocks



Gray banded biotite-rich quartz plagioclase gneiss; in part contorted, migmatized with quartz diorite (qd) and complexly intruded or injected by leucogranitic rocks (gr).



Small lenses of white layered marble and associated clac-silicate rocks.

Mesozoic

~57 TO ~250

MILLION YEARS

Paleozoic  
or Older

~250 TO ~590

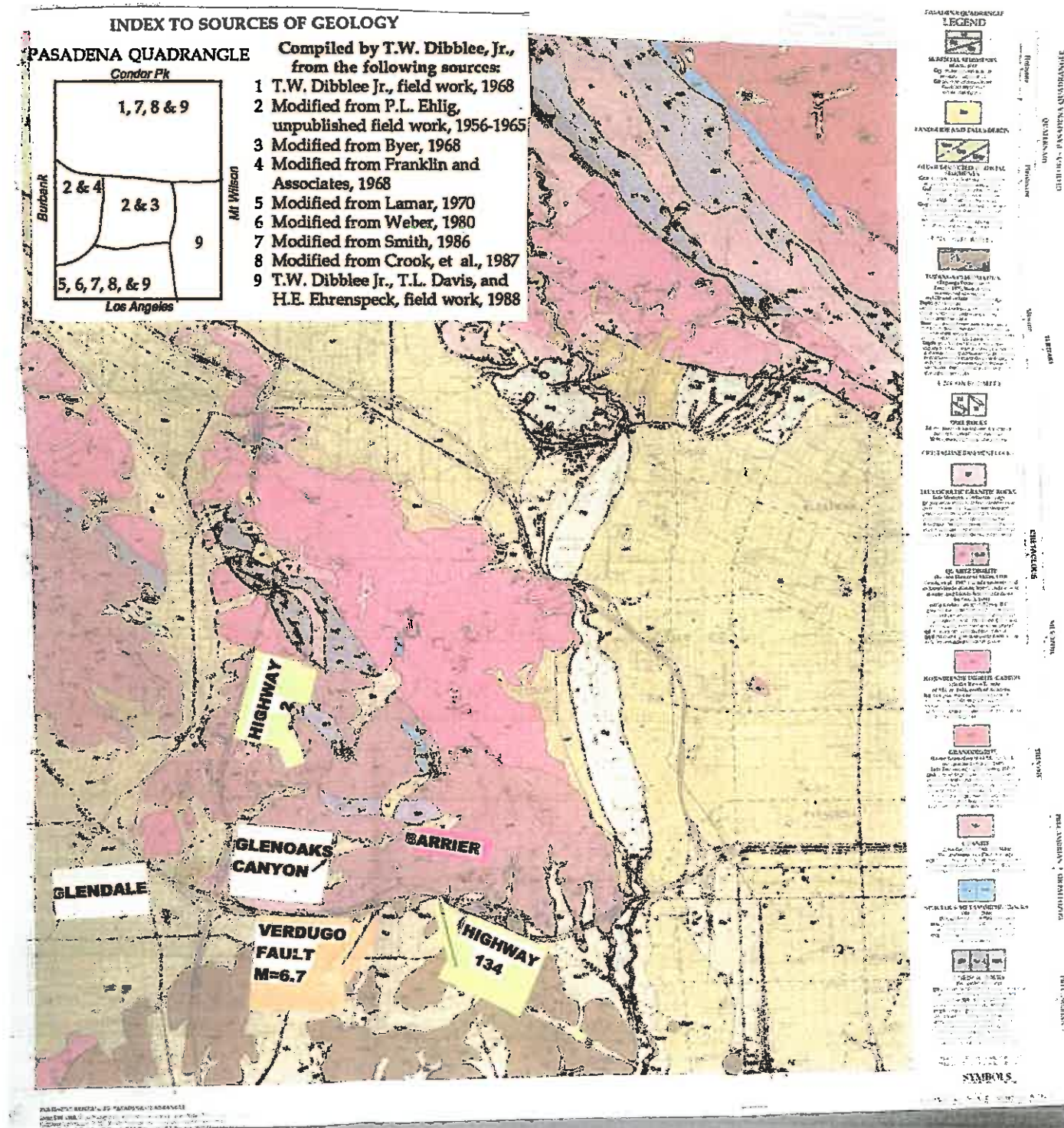
MILLION

YEARS

Precambrian (?)

OLDER THAN

~590 MILLION YEARS



**GEOLOGIC MAP OF THE PASADENA QUADRANGLE, LOS ANGELES COUNTY**  
By Thomas W. Dibblee, Jr., 1989. Dibblee Foundation Map #DF-23, First Printing May 1989



## VERDUGO FAULT

### LOSS ESTIMATION FOR CALIFORNIA EARTHQUAKES

Using HAZUS loss estimation software (HAZUS is a nationally applicable standardized methodology that contains models for estimating potential losses from earthquakes, floods, and hurricanes), created by the Federal Emergency Management Agency (FEMA), the California Geological Survey, and the United States Geological Survey, developed economic losses for the ten most damaging "scenario earthquakes" (R. Chen, D. Branum, and C.J. Willis, California Geological Survey, 2009) (see chart below).

#### Five Most Damaging Scenarios Earthquakes in Northern and Southern California and Associated Economic Losses

	Scenario Earthquakes	M = Mag- nitude	Economic Losses (\$M) (M=millions)		
			Buildings Related (\$M)	Transportation System (\$M)	Utility System (\$M)
Northern California (Initials = Individual Faults)					
N1	Northern San Andreas Fault (SAS+SAP+SAN+SAO) <sup>1</sup>	7.90	79,834	1,436	2,583
N2	Northern San Andreas Fault (SAS+SAP+SAN) <sup>1</sup>	7.76	70,628	1,172	2,026
N3	Northern San Andreas Fault (SAP+SAN+SAO) <sup>1</sup>	7.83	66,216	1,162	1,856
N15	Hayward-Rodgers Creek Fault (HS+HN+RC) <sup>1</sup>	7.26	36,883	826	1,695
N4	Northern San Andreas Fault (SAF SAS+SAP) <sup>1</sup>	7.42	34,299	721	1,212
Southern California					
S8	Puente Hills Fault	7.1	79,662	1178	1,966
S17	Newport – Inglewood Fault	6.9	34,319	482	958
S1	Verdugo Fault	6.7	23,751	270	826
S2	San Andreas Fault – Southern	7.8	20,515	503	1,489
S18	Palos Verdes Fault	7.1	20,084	367	796

#### California Geological Survey Regional Geologic Hazards and Mapping Program LOSS

California Geological Survey - 2009 Earthquake Loss Estimation

HAZUS Loss Estimation for California Scenario Earthquakes

Rui Chen, David Branum, and Chris J. Willis

California Geological Survey

June 2009

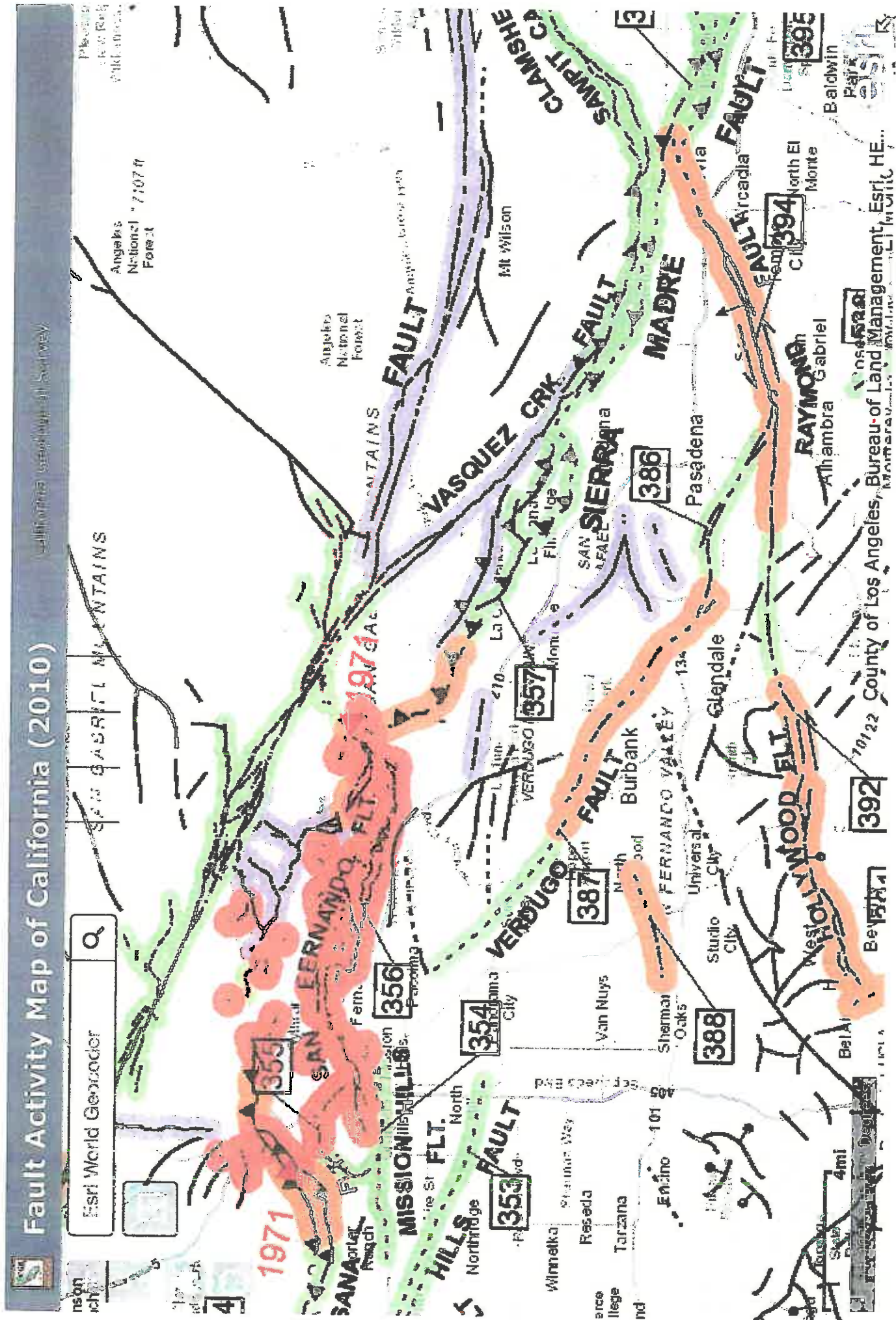
The estimated magnitude earthquake, in this report, for the Verdugo fault is M 6.7. The monetary loss (in the above chart) for buildings is estimated to be \$23,751,000. This is the fifth most damaging scenario earthquake in southern California.

**Stantec (2017, 3.6.7, page 148)** concludes that "potential impacts related to rupture of a known earthquake fault (referring to the Verdugo fault) or strong seismic ground shaking are considered less than significant".

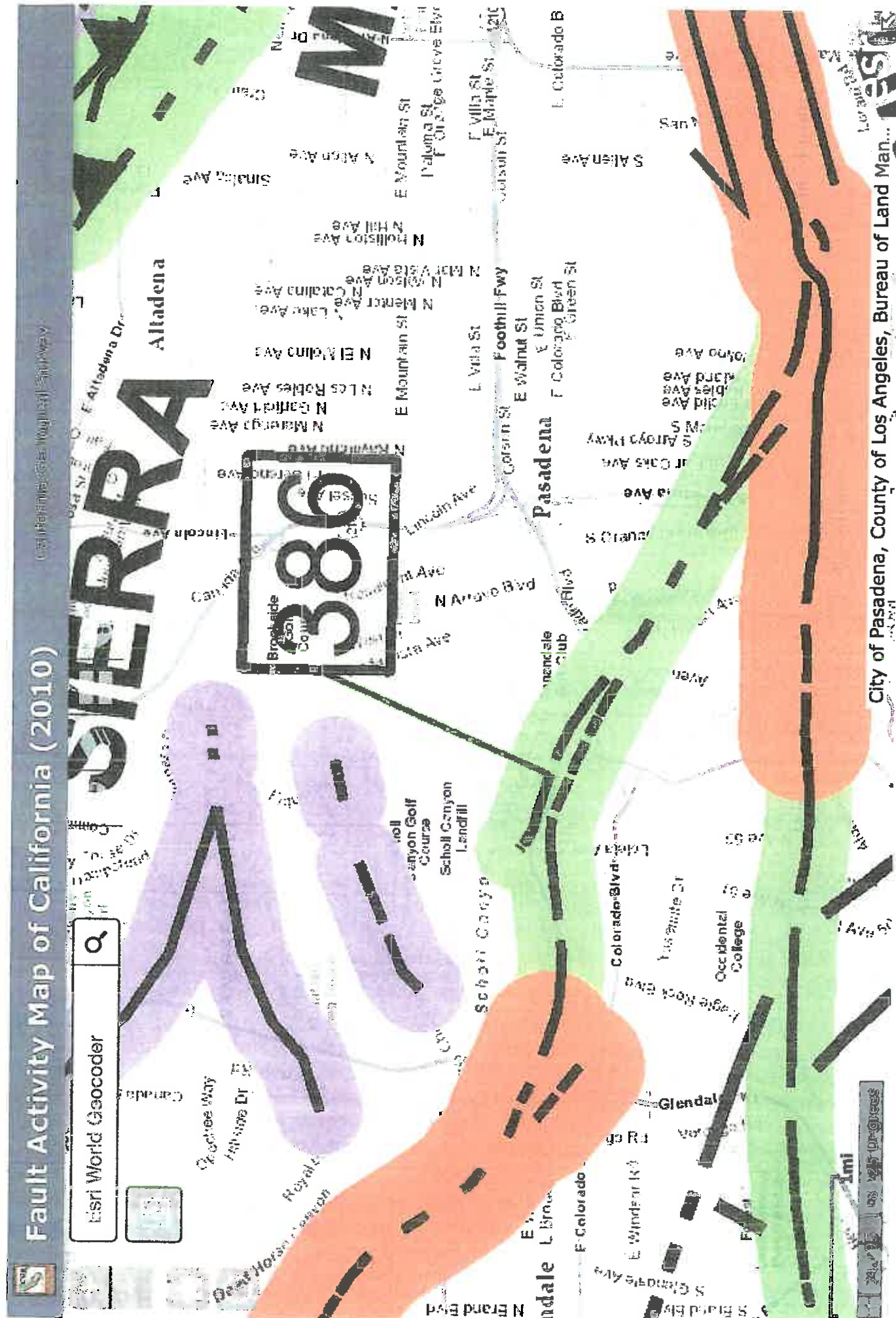
However, the Fault Activity Map of California (2010) (**Pages 22, 23**), California Geological Survey (see maps below) indicates that fault activity along a strand of the Verdugo fault (**orange**), M 6.7, ~ 0.5 mi west of the landfill, occurred during the Holocene Epoch, i.e., between 11,700 and 200 years before Present.

Damage from the 1994, M 6.7, Northridge earthquake occurred up to **85 miles (125 km)** away from its epicenter, with the most damage in the west San Fernando Valley, and the cities of **Santa Monica, Simi Valley** and **Santa Clarita**.

A strand of the Verdugo fault (**green**), depicted on the fault activity map, < 0.5 mi. south of the landfill, is estimated to have been active between 700,000 years (Pleistocene Epoch) and the Holocene Epoch (i.e., between 11,700 and 200 years).









## CONCLUSIONS

The Glendale City Counsel should consider both the beneficial monetary aspects for the City of Glendale that might result from the proposed expansion of the Scholl Canyon Landfill (**Stantec 2017**), and the environmental safety of the citizens of Glendale and beyond.

Based on my analysis, the present landfill, the proposed expansion of the Scholl Canyon Landfill, and the geologic hazards within and near the landfill represent both present and future environmental threats to the health and safety of citizens living in the region.

There are hazardous substances present both down-regional drainage from the concrete and volcanic ash (bentonite) subsurface barrier and to the east of the barrier near the western boundary of the landfill. These substances are documented in quarterly and annual monitoring reports for the Scholl Canyon Landfill by the California County Sanitations Districts of Los Angeles County. There are more than 200 substances of concern (**Page 7**) associated with the Scholl Canyon Landfill. One of those substances is trichloroethene. Statistical analyses show an increasing trend for Trichloroethene. Trichloroethene has been detected in monitoring wells since at least 1991.

The absence of a composite liner or impermeable membrane at the base of the landfill, and above a highly fractured rock basement, allows substances of concern to percolate down the regional drainage into the groundwater.

The presence of the Scholl Canyon fault zone, depicted on **pages 14 and 16**, can also act as a conduit for contaminated groundwater to migrate westward in the subsurface.

**Stantec 2017 Section 3.6.3**, referring to the Scholl Canyon fault or faults, notes that "recent (sic) mapping by Dibblee (1989) does not even show these faults, and there is (sic) no data available to indicate that these fault traces, if even present, are active" (*underline emphasis mine*).

**My Comments:** The Scholl Canyon faults were mapped by Byer, J.W., 1968, Geologic map of a part of the San Rafael Hills. This is an "Unpublished map prepared for the City of Glendale," as per Weber et al. 1981, i.e., Weber, F.H., Jr., Bennett, J.H., Chapman, R.H., Chase, G.W., and Saul, R.B., 1981, Earthquake hazards associated with the Verdugo Eagle Rock and Benedict Canyon fault zones, Los Angeles County, California, U.S. Geological Survey, Open-file report No. 81-296, 173 p.].

The landfill opened in 1961. The northern or northeastern part of the landfill was inactive (filled) by 1975. Filling of the southern part began in 1975. J.W. Byer would have had access to Scholl Canyon (upper Glenoaks Canyon) in 1968 in order to map the geology in the canyon. The canyon would have been cleared and prepared, or was in part being prepared, for accepting trash just before the geologic mapping of Byer (1968). **None** of the contributors to the Geologic map of the Pasadena quadrangle (**Page 19**), including Tom Dibblee, is known to mapped in the southern part of the Pasadena quadrangle, or in Scholl Canyon/upper Glenoaks Canyon during the 1960s.

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I will leave it to the reader as to why a contributor to the **Stantec 2017** report would seemingly denigrate or minimize the geologic mapping of J.W. Byer done in 1968. [Note: J.W. Byer (1975) was the editor of Sycamore Canyon fault, Verdugo fault..., Guidebook for the Southern California Section of the Association of Engineering Geologists Annual Field Trip, September 27, 1975, 68 p.]

**Stantec 2017** concludes that ground shaking during seismic activity of 6.7M along the Verdugo fault would be less than significant.

**My comments:** The California Geological Survey (CGS), in contrast to seismic activity being "less than significant", concludes that the Verdugo fault is one of the five most damaging scenario earthquake faults in Southern California. The estimated monetary loss for destroyed and damaged buildings during seismic activity associated with the Verdugo fault is estimated to be \$23,751,000.

An earthquake with a magnitude of M6.7, as assigned by the CGS and the U.S. Geological Survey (a magnitude of 6.9 is assigned in Stantec 2017) to the Verdugo fault is considered a "moderate earthquake" (Richter, C.F., 1935, Bulletin of the Seismological Society of America, v. 25, no. 1-2, p. 1-32. Damage associated with a 6.7 magnitude earthquake would damage "a moderate number of well-built structures in populated areas" (and engineered structures at the landfill). "Earthquake-resistant structures would survive with slight to moderate damage". "Poorly designed structures would receive moderate to severe damage". "A M6.7 earthquake is felt in wide areas, i.e., up to hundreds of miles/kilometers from the epicenter". "There is strong to violent shaking in the epicentral area". A magnitude 6.7 earthquake could rupture the barrier in the Scholl Canyon landfill, damage engineered structures, electric power facilities, and equipment, based on damage caused by the M6.7 1994 Northridge earthquake.

**With the health and safety of Glendale's men, women, and children at stake, this is the time for great caution when considering further developing the Scholl Canyon landfill.**

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Earthquake damage, Northridge Earthquake, 1994, M6.7

From: [Wp](#)  
To: [Joe. Dennis](#)  
Subject: Submission of Public Comment for Biogas Renewable Generation Project MND  
Date: Thursday, October 19, 2017 8:06:34 AM

---

32

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### **Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

### **Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

### **Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower [Scholl Canyon Park](#) where children play, there are several homes within meters, and children’s baseball fields are located.

### **Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Dennis Malone

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**From:** [CB Ferrari](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Thursday, October 19, 2017 3:24:37 PM

---

Dear Mr. Joe:

I have recently learned about the Mitigated Negative Declaration for the Biogas Renewable Generation Project, and am very concerned about its effects on residents. My neighbor shared the following information with me, and it seems like it would be a terrible mistake to allow this project to proceed:

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Please stop the construction of this power plant. Thank you.

Best regards,  
 Elizabeth Ferrari  
 Glendale 91206

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**From:** [gsysock](#)  
**To:** [Joe, Dennis](#)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Sinanyan, Zareh](#); [Najarian, Ara](#); [vgajanian@glendaleca.gov](#); [Zurn, Stephen](#); [Ochoa, Scott](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Thursday, October 19, 2017 1:37:24 PM

---

34

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am a resident of Glenoaks Canyon, and concerned about the following:

### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

34-1

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34-3

### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

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### Geology

There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are

34-6

located.

↑ 34-6  
●

**Cumulative Impacts**

The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

● 34-7  
↓  
●

Best regards,

Gary Sysock

2632 Hollister Ter

Sent from my T-Mobile 4G LTE Device



October 19, 2017

35

**TO: Community Development Department, Planning Division,  
City of Glendale**

**FROM: Gerry Rankin, Lifetime Resident of Glendale, Resident of Glenoaks  
Canyon for 76 years of my 81 years on Earth, Member of Glenoaks Canyon  
Board of Directors**

**Comment on Intent to Adopt a Mitigated Negative Declaration relating to  
"Biogas Renewable Generation Project"**

Notice of Intent to Adopt a Mitigated Negative Declaration with regard to a proposed "Biogas Renewable Generation Project" was placed on the City of Glendale's website on August 30, 2017. It could be found under the project location of 7721 N. Figueroa St., Los Angeles, CA 90041, an address totally unfamiliar with Members of Glenoaks Canyon Board of Directors, who have been deeply concerned about the expansion of the Scholl Canyon Landfill since 2014. The notice states as follows: "The Proposed Mitigated Declaration and all documents referenced therein are available for review in the Community Development office, Room 103 of the Municipal Services Building, 633 East Broadway, Glendale, California 91206-4386 and on the Planning Division website: <http://glendaleca.gov/environmental>." The notice also states that written comments may be submitted to the Community Development Department, Planning Division office, at the address listed above, by September 30, 2017. (The September date was changed to October 20, 2017, due to complaints that the notice was not received by the Glenoaks Canyon Homeowners Association and that finding it on the City website listed under an obscure address was next to impossible for City residents.)

35-1

On October 12, 2017, I attempted to access the above-described documents at the stated address and office. They were not available. In fact, no one who talked with me in that office seemed to have heard about these records. I was told to go to the Water & Power Building. There I located a manager-type electrical engineer on the Fourth Floor. He told me that the only way I could review the records on the Scholl Canyon and Grayson projects was by logging into a computer to a couple of websites he listed for me. There was no possibility for me to see paper records.

35-2

In response to my questions, the gentleman kindly provided a general description of the power station and its proposed mission. He said the project would consist of four separate generators, each of which would be incased in a box-like container forty feet long. They would be transported to the site separately and they could operate separately when installed. Presumably other such units could be added to or subtracted from the station, as needed. They were mobile. The four units operating as a set would be able to produce 10 to 12 megawatts of electricity per day compared with the approximate 250 megawatt capacity that a modernized Grayson Power Plant would be expected to produce. The basic

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purpose of this Scholl Canyon plant would be to consume the methane gas constantly coming from the landfill. However, due to the corrosive nature of the impurities in the landfill gas, a cleansing process for the gas should occur before it would enter the four generators to produce electricity by combustion. Therefore, a gas-refining unit, such as the one already in place at the landfill, would be a part of the project. Also, a gas line owned by the City would be extended to assist in the purifying process and, if the conditions warranted, to increase the supply of gas injected into the generators.

When I asked about the status of a proposed anaerobic digester at the Scholl Canyon site, the gentleman told me he did not know anything about an anaerobic digester at the site. He indicated that a digester would not be needed. With the gas from the landfill and the extended gas line, there would be plenty available gas at the site to make the small power generating plant economically practical. When I heard him talk about the four generators the size of 40-foot containers, I visualized seeing them being pulled by heavy-duty tractor-trailers. With this relatively mobile equipment, I thought, if four could be moved and hooked up, why couldn't four more be brought in? That would make this project easy to build on whenever the City might decide to expand the operation. This is the kind of thing that makes many residents nervous. Why? Because so many pieces in the puzzle seem to indicate that the City's planning for Scholl Canyon points to a long-term goal to keep the Scholl Canyon Landfill open a very long time.

Why is it that the City is so anxious to tear out the pipeline that moves the methane gas from Scholl Canyon to Grayson Power Plant? The City has provided no evidence to support comments that are intended to give the impression that the pipeline is defective and dangerous. Moreover, why is the City so anxious to stop all electricity production at Grayson for an extended period during the "repowering" process even though Grayson has an existing turbine that Water & Power says is in excellent condition and is quite capable of competing with other first-rank gas-fired turbines in the State? That leads us to think that the answer might be that if this turbine were to continue in use, the primary argument for building the proposed Scholl power station would be gone.

After failing to obtain records on either the proposed power station at Scholl Canyon or on the proposed repowering of the Grayson Power Plant, I went to the Main Glendale Public Library to learn whether the library had a copy of the records as stated in City messages issued on the internet. The librarians searched through their records, including the records they maintain in the library's basement, but they could find no trace of the records or any indication that the library had received the records.

The failure to make the paper records available, as the City has promised in writing, may not have been a problem for many people. However, it was a critical barrier for me. At 81 years of age, with a sore back that has required extensive therapy and was a factor in me retiring at the age of 67 years, I have difficulty sitting in front of a computer screen for long periods of time. Nevertheless, I

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have received copies from friends of some sections of the Mitigated Negative Declaration.

Three other major projects are tied to the small but expensive power plant at Scholl Canyon. They are: 1) expansion of the Scholl Canyon Landfill, 2) the anaerobic digestion project, and 3) perhaps most important of all, Grayson Power Plant. So let's take these three one at a time but in reverse order:

- 1) Grayson Power Plant: The first question that crossed my mind when I heard the City's proposal for Grayson was: Why would the City want to spend three, four, or five hundred million dollars to build a new gas-fired power plant when electricity is cheaper now on the electricity grid than we could have ever imagined three or four years ago, and especially why do that when gas-fired generation is losing to solar, wind, hydroelectric, and other ways of producing electricity? I can't imagine that the State of California will permit the proposed rebuilding of Grayson Power Plant. Yet their likely refusal to permit it would be for our own good. A new costly Grayson Plant would seriously compromise Glendale's financial health and could send our City into bankruptcy. So we had best not do anything risky at Scholl Canyon until we get news from the State with regard to permitting the City's plans for Grayson. Once we learn the fate of Grayson, we shall be in a better position to decide what should be done about the proposed four-generator power plant at Scholl Canyon Landfill.
- 2) Anaerobic Digestion Project: The comments made to me by the official at Water & Power on October 12, denying knowledge of any role of an anaerobic digester at Scholl Canyon, surprised me because the City informed the Glenoaks Canyon Homeowners Association about an anaerobic digester component to the expansion of the Scholl Canyon Landfill in 2014 prior to mentioning anything about the small power plant. Moreover, City staff has often presented both projects as a complimentary set for improving the performance of the landfill site. Meanwhile, I have learned that many residents of Glenoaks Canyon fear the anaerobic digester more than the proposed small power plant. Increased truck traffic to, at, and from the site, along with odors, and general messiness of the operation are the undesirable impacts often mentioned. Another is the cramped space at the site, which is at the entrance used by all vehicles hauling waste to the landfill. Likely excavation of a steep chaparral-covered hill on the east side of the site would be required to squeeze in both the power plant and an anaerobic digester together with the present operations already established there.
- 3) Expansion of Dumping at the Scholl Canyon Landfill: Dumping and burying waste at Scholl Canyon is now and, since its inception in 1960, has been the only activity related to waste disposal at the site. Thus, the straightforward solution to waste disposal in Glendale and the neighboring watershed has always been to increase the horizontal and vertical boundaries of this activity. This is the solution applied a number of times

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during the fifty-plus years the landfill has existed. The one major hurdle has been receiving a permit for the latest desired expansion. By 2004, the County and the City began to be seriously concerned that the generous permitted width and height in effect at that time would not be sufficient in twenty or twenty-five years to accommodate an increasing volume of waste that was being presented for disposal at the landfill. Since the permitted height of 1,525 feet above sea level was more critical than the horizontal boundaries due to a lack of useable horizontal space, the focus has been on increasing the permitted height. The City chose an addition of 180 feet, which would mean that the landfill would reach an elevation of 1,710 feet above sea level. However, the amount of waste for disposal has decreased substantially since 2004 for various reasons. Thus, the need to increase the height has not been as pressing as it was thirteen years ago. The existing permitted height of 1,525 feet now seems sufficient until at least the year 2030.

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Nevertheless, the City, with the County's strong support and insistence, decided to proceed with plans to complete and release to the public in early 2014 the Draft Environmental Impact Report (DEIR) that had been in the works for several years. City Council must have been shocked by the avalanche of comments opposing the expansion of the landfill through increasing the permitted height to 1,710 feet above sea level, along with another recommendation to increase both the vertical and the horizontal dimensions. These opposing comments not only came from affected residents in the neighboring communities, they also came from government agencies such as the Solid Waste Management Committee of Los Angeles County, the Environmental Programs Division of Los Angeles County, the Director of Planning and Community Development of Pasadena, and the Los Angeles City Board of Education. They pointed out numerous adverse impacts that they considered would occur, and have been occurring, by the ill-placed landfill created on a range of hills laced with beautiful riparian canyons, surrounded by pleasant residential communities, and facing the critical disadvantage of being within one half-mile of a major earthquake fault. The Glenoaks Canyon Homeowners Association has consistently pleaded for the City to establish a specific date when the landfill will be closed so that the City might, at last, fulfill its promises to restore, within a reasonable length of time, the site for recreational purposes. Adding a power plant and an anaerobic digester would be viewed as another serious backward step taken by the City.

35-13

The recreational and aesthetic issues relating to the Scholl Canyon Landfill have become especially pertinent by the "Rim of the Valley" project, for which legislation is now being moved forward in the U.S. House of Representatives by Congressman Adam Schiff and in the U.S. Senate by Senator Dianne Feinstein. The still beautiful San Rafael Hills have been deeply wounded by the Scholl Canyon Landfill, and they will never be restored to their original beauty, but once the landfill is closed,

35-14

restoration can begin, and all of the San Rafael Hills can be made suitable for inclusion as a part of a National Recreation Area.

35-14

My experience searching for records is emblematic of the way the projects at Scholl Canyon Landfill are being handled right now. (I cannot speak for Grayson Power Plant because I was late in paying attention to the plant, thinking it was a goner, until I began to realize this week just how pivotal it is to everything that might happen at Scholl Canyon Landfill.) After months and years of unhurriedly, almost casually, letting the public know about its proposals at Scholl Canyon in broad, outline form, Glendale Water & Power seems to be hurriedly trying to turn these vague proposals into real-life projects, seemingly disguising all that they are doing from the people who would be most affected by the projects and who have been begging to learn the expected impacts from them. In fact, those who are working to push these Mitigated Negative Declarations on the "Biogas Generation Project" and the Anaerobic Digester project seem to be pushing so hard that they have confused not only the public but also City employees who were meant to assist with the projects. The City needs to slow down. It needs to have the proposals re-written as one proposal because all four parts are being created to work together as one interrelated master project.

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As in the matter of electricity generation, new technology for waste disposal is rapidly developing. Plasma technology, which promises to be a clean and efficient way of disposing of municipal waste, is now on the verge of advancing beyond the currently existing boutique level of application – the disposal of toxic medical supplies, the disposal of waste generated in space exploration, and the disposal of the waste from our country's newest aircraft carrier, along with a number of other applications in Europe and Japan. Conferences involving this technology, including its application to municipal waste, are being held this year in several places – even in Los Angeles. One was scheduled for Colorado Springs this very week.

35-16

If we, together, set our sight on restoration, not further abusive industrialization of the San Rafael Hills, we are sure to find better solutions to our waste disposal and electric power problems than those that are being presented for permitting at this time. Let's look beyond the next ten to fifteen years to what will work for us fifty to one hundred years in the future. To begin with, let's find out about the alternatives to disposing of waste in the ground or disposing of it through a messy, complicated anaerobic digestion system. New clean technology is now becoming available for waste disposal. Let's learn about it and use it.

35-17

  
Gerry Rankin

Residence: 2423 Hollister Ter., Glendale, CA, 91206

Mailing Address: Gerald Rankin, P.O. Box 11058, Glendale, CA 91226-7058



October 19, 2017

By Hand

36

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project  
MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. **The air pollution will affect the health of everyone in the surrounding area including kids on the sports fields (especially Scholl Canyon and Eagle Rock, the Rose Bowl Aquatic Center), in the schools (Art Center College of Design, Glenoaks Elementary) and many surrounding residents.**

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2. The modeling study used to determine pollutants is flawed as it used two air monitoring stations, one in Pasadena, four miles from the landfill and one in Los Angeles, six miles from Scholl. **There are no air monitors in Glendale, at all.** Not to mention that the air quality is not measured at the boundaries of the landfill or near our homes, schools and recreation areas.

36-3

**Hazards**

1. Power plants, power lines, and methane flaring bring the *risk of fire and explosion*. The landfill is surrounded by residential communities and is located in an area that is deemed a *fire hazard by the Glendale Fire Department and the State of California*. Many residents cannot currently get private fire insurance because of the risk. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills **and leave the City of Glendale legally liable for massive loss of life and property in the event of an "accident".**

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2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire, as we saw happen in the recent fires in northern California.

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**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where

36-6

children play, there are several homes within meters, and children's baseball fields are located. **The information in the MND was calculated using 2008 seismic maps instead of the more recent 2014 maps which indicate additional fault lines that have been verified.**

2. The landfill opened in 1961 and operated for 15 years before there were EPA regulations to prevent hazardous waste from being deposited in landfills. The landfill has no liner, as is required under every landfill now. The landfill site sits on a fractured granite base that does not contain the chemicals that leach down through all landfills. Barrier wells have been placed at the base of the landfill, but un-treated water seeps out of the landfill in several other locations.

#### **History of Infractions**

Scholl Canyon Landfill has been plagued by foul smells, dangerous gas seepage (Attached, Letter December 31, 1997, Notice of Violation) as well as current non-compliance with EPA regulations. (Attached, letter from County of Los Angeles Public Health, dated April 6, 2017).

The Mitigated Negative Declaration underestimates the negative impact on the surrounding area for the power plant. In addition it does not take into account how the power plant would affect people and the environment when you add in the effects of the landfill that already exists, and further it does not even mention the plan to build an adjoining Aerobic Digestion facility.

Current documentation with the California recycle states that the landfill is scheduled to close in 2018.

It is unfathomable that the city could be planning to build expansions and industrialize this property without an Environmental Impact Report for the impact of their combined plans.

Sincerely,



Helen Mallory  
2317 Blackmore Drive  
Glendale, CA 91206  
helenmallory@hotmail.com

cc: (via e-mail)  
V. Gharpetian  
P. Devine  
Z. Sinanyan  
A. Najarian  
V. Gajanian  
S. Ochoa  
S. Zurn





**BARBARA FERRER, Ph.D., M.P.H., M.Ed.**  
Director

**JEFFREY D. GUNZENHAUSER, M.D., M.P.H.**  
Interim Health Officer

**CYNTHIA A. HARDING, M.P.H.**  
Chief Deputy Director

**ANGELO J. BELLOMO, REHS, QEP**  
Deputy Director for Health Protection

**TERRI S. WILLIAMS, REHS**  
Director of Environmental Health

**BRENDA J. LOPEZ, REHS**  
Assistant Director of Environmental Health

5050 Commerce Drive  
Baldwin Park, California 91706  
TEL (626) 430-5374 • FAX (626) 813-3000

April 6, 2017

Jeff Hackett, Manager  
Permitting & Assistance Branch  
Waste Permitting, Compliance & Mitigation Division  
P.O. Box 4025  
Sacramento, CA 95814-4025  
Mail Stop10A-15  
*Via LEA Portal*

**SUBJECT: Report of Facility Information (RFI) Amendment Scholl Canyon Landfill. SWIS No. 19-AA-0012**

Dear Mr. Hackett:

The Solid Waste Management Program (SWMP), acting as the Local Enforcement Agency (LEA), has completed a review of the Report of Facility Information (RFI) Amendment which was received on March 8, 2017.

This agency has determined that the application package does not meet the requirements of Title 27 of the California Code of Regulations (27 CCR) § 21570 for a complete and correct application and is hereby rejected according to 27 CCR § 21650 (d) on March 6, 2017.

The applicant may appeal this decision to the LEA within fifteen (15) days of the date of notification pursuant to 27 CCR 21615. The appeal must be in writing and specify the grounds for the appeal. See the attached "Request for Hearing" form.

Should you have any questions, please contact Dorcas Hanson-Lugo (R.E.H.S.) or myself at (626) 430-5540.

Sincerely,

  
Kumari Gossai, R.E.H.S.  
Solid Waste Management Program, LEA

Cc: Stephen M Zurn, City of Glendale (Electronic copy)  
Bradford M Bolger, L.A County CEO (Electronic copy)  
Jessica Burkhead, Sanitation District of the County of Los Angeles  
Sam Shammas, Sanitation District of the County of Los Angeles  
Wen Yang, Regional Water Quality Control Board (Without Enclosure)  
Nelly Castellanos, LEA (Electronic copy)  
Dorcas Hanson-Lugo, LEA (Electronic copy)  
File:

Enclosure: RFI Amendment Application



**BOARD OF SUPERVISORS**

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Second District

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**Janice Hahn**  
Fourth District

**Kathryn Barger**  
Fifth District

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## Scholl Canyon Landfill SWIS# 19-AA-0012

### Grounds for rejection of Report of Facility Information application received on March 8, 2017

1. Missing perimeter/boundary delineating 1000 feet around the site. Provide a vicinity map of the site indicating sensitive receptors within 1000 feet of the perimeter/boundary.
2. Every load is 'potentially radioactive' and should be scanned before taken to the isolated area.
3. The radioactive loads must be 'quarantined' and not be inspected or opened for the health and safety of the personnel. (Section 4.1)
4. Provide the tonnage for the 26, 000 loads of green waste and asphalt in Section 4.5. The math is confusing and is in conflict with Table 14 for the year 2015.
5. What is the purpose of the up gradient well in Section 5.5.1?
6. The change of the hours of operation in Section 7.1 can only be approved by a permit modification.
7. Update Table 13 to include all equipment. Is there a sweeper and a towed blade grader at the site?
8. How is the green material managed to prevent composting or becoming odorous? See Section 7.7.1.
9. Is the green material kept for 72 hours? Is this before or after processing? Are temperatures taken?
10. Describe how the tires are stored to prevent the breeding and harborage of vectors in Section 7.7.2.
11. A permit is required for 500 tires.
12. Paragraph 2 of Section 7.7.5 is confusing. Where are the materials stored between the time of recovery and the time that they are loaded into the roll-offs?
13. Include Los Angeles County Radiation Management in Table 16 for the current Emergency Response List.
14. Include the LEA's after-hours phone number (213-974-1234) on the sign at the entrance to the site, in Table 16 and Figure 29.
15. Provide the eyewash stations, first aid stations, hazardous waste storage, e-waste storage, etc. on a figure as part of the JTD. Section 7.9.4.
16. Provide key names in the organization chart and their resumes. (Figure 25)
17. Include that there are personnel from other Sanitation Districts locations who may come in to assist the site as needed.
18. Address 27 CCR 20790 - Leachate Control. *The operator shall ensure that leachate is controlled to prevent contact with the public.*
19. In Section 7.11.7, include that there are security cameras throughout the site.
20. In Section 7.11.10 there is no mention of Leachate control as stated in Table 3 on page 1-12.

36-14

## Scholl Canyon Landfill SWIS# 19-AA-0012

21. Address CCR 20820-Drainage and Erosion Control. *(a) The drainage system shall be designed and maintained to: (1) ensure integrity of roads, structures, and gas monitoring and control systems; (2) prevent safety hazards; and (3) prevent exposure of waste*
22. Address 27 CCR 20630 – Confined Unloading. *Unloading of solid wastes shall be confined to as small an area as possible to accommodate the number of vehicles using the area without resulting in traffic, personnel, or public safety hazards. Waste materials shall normally be deposited at the toe of the fill, or as otherwise approved by the enforcement agency.*
23. Confined Unloading should have its own Section.
24. Address 27 CCR 20540 – *Roads within the permitted facility boundary shall be designed to minimize the generation of dust and the tracking of material onto adjacent public roads. Such roads shall be kept in safe condition and maintained such that vehicle access and unloading can be conducted during inclement weather.*
25. Roads should have its own Section and should include the preventative measures (like rumble strips,) for the offsite migration of dust/dirt onto public streets.
26. Clarify that it is Sanitation District's Solid Waste Management Department who keeps a copy of the complaints.
27. Are the telephone numbers listed in Paragraph 2 of Section 8.1 posted on the signs at the site?  
If so, provide as a figure as part of the JTD.
28. Section 8. Nuisance Control – Discuss the procedures to prevent nuisances. In paragraph 3 of Section 8.1 include that it is the Sanitation District who keeps the log.
29. All incoming loads should be tarped. (Section 8.7.)
30. Revise Section 8.5. It is confusing and there are misspelled words: whistles; cannon gun, etc.
31. In Section 8.11, Paragraph 3, the radioactive loads are not opened or inspected in order to protect the health and safety of personnel.
32. How long are the records maintained? Provide the duration for the various records.

36-14

OF

# Glendale CALIFORNIA

Environmental Management Center  
780 Flower Street, Glendale, CA 91201

(818) 548-4030

December 31, 1997

Fire Division  
HAZARDOUS  
MATERIALS  
SECTION

CERTIFIED MAIL  
Return Receipt Requested

FILE  
COPY

Scholl Canyon LFG Limited Partnership  
c/o Scholl Canyon Landfill Gas Corporation  
13 Elm Street, Suite 200  
Cohasset, MA 02025

Attention: Gordon L. Deane, President

Subject: NOTICE OF VIOLATION  
Scholl Canyon Landfill Gas Recovery Project  
3001 Scholl Canyon Road

Gentlemen:

This letter will serve to provide notice, and does hereby so provide, that the POTW grab sample of condensate wastewater from the subject facility, taken on December 19, 1997, was found to have a flash point of 81° Fahrenheit in violation of local prohibitive discharge limits of 140° Fahrenheit. Additionally, this sample was found to contain an oil and grease content of 1524 mg/L and a dissolved sulfides content of 4.54 mg/L in violation of their local discharge limits of 600 mg/L and 0.1 mg/L respectfully.

36-15

On December 30, 1997, your representative at this facility Mr. Steve Cooper of SCS Field Services was advised of the above violations and was instructed to cease discharge of the condensate to the municipal wastewater system. Per our conversation with Mr. Cooper of SCS Field Services, Mr. Jake Amar and Mr. Desi Alvarez of Glendale P.W. it was agreed that the condensate would be batch treated and tested for compliance with local discharge limits for flammability prior to obtaining discharge authorization from this office. Furthermore it was agreed that if a batch analysis failed local limits then said batch shall be hauled off-site for legal disposal. Additionally, it was agreed that this would be a temporary solution until the cause of the violations have been determined, adequate pretreatment has been provided, full compliance with discharge limits has been achieved and approval granted from this office.



It is required that you submit within 20 days of receipt of this notice of violation a detailed letter of explanation as to the cause of the above violations and corrective actions that will be taken to prevent future violations.

If you have any questions regarding the above subject matter you may contact Doug Kitchen or myself at (818) 548-4030.

Very truly yours,



Gregory P. Ahern, Sr.  
Industrial Waste Inspector

cc:	Steve Zurn,	P.W.
	Jake Amar,	P.W.
	Ray Huff,	SCS
	Steve Cooper,	SCS

36-15

MND

P. 1204



**From:** Zurn, Stephen  
**Sent:** Monday, October 23, 2017 10:18 AM  
**To:** Joe, Dennis  
**Cc:** Krause, Erik  
**Subject:** Fwd: Public comment for biogas project

FYI.

Begin forwarded message:

**From:** Linda Pillsbury <[lindapillsbury@gmail.com](mailto:lindapillsbury@gmail.com)>  
**Date:** October 20, 2017 at 1:57:47 PM PDT  
**To:** [SZurn@glendaleca.gov](mailto:SZurn@glendaleca.gov)  
**Subject:** Public comment for biogas project

Dear Mr. Zurn,

Below and attached, please find my public comment submitted for the Biogas Renewable Generation Project.

Linda Goodman Pillsbury  
2528 Sleepy Hollow Dr.  
Glendale, CA 91206  
[lindapillsbury@gmail.com](mailto:lindapillsbury@gmail.com)

October 19, 2017

Dennis Joe, Biogas Project Planner,  
Community Development Department, Planning Division Office, 633  
East Broadway, Glendale, California 91206-4386  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe,

My name is Linda Pillsbury and I live and work in Glendale. I would like to comment on the Biogas Renewable Generation Project proposed for Scholl Canyon. There are many issues that the MND raises but does not adequately address, including the degree of air pollution, handling of hazardous materials, and impact on the surrounding communities which include several schools, densely populated residential areas and well-used recreational facilities.

While there is much to say on those issues, I would like to keep my comments brief and address the big picture. There are four projects which Glendale has been moving forward with: 1) this

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Scholl Canyon power plant (the Biogas Renewable Generation Project), 2) an Anaerobic Digester also at Scholl Canyon, 3) expansion of the Scholl Canyon Landfill, and 4) Repowering of Grayson Power Plant. All these projects are interrelated and therefore should be considered together. All will affect each other, the environment, and the surrounding communities. We should be looking at Glendale's needs and goals as a whole, and how we can best meet them, and it is impossible to do that in a piecemeal way, looking at each project alone.

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Separating the projects as is currently being done raises transparency issues. While it may not be the city's intent to obfuscate the issues, there certainly is an appearance of lack of transparency, an appearance that these projects are deliberately being shepherded through to keep the public from seeing the big picture. I am sure that Glendale City government would want a comprehensive and open process that thoroughly addresses all issues.

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So my thoughts and positions are:

All 4 projects should be looked at together and planned together. That includes a comprehensive Environmental Impact Report that addresses all components of the 4 projects.

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There are enough issues in the MND for Biogas Renewable Generation Project that are incompletely or inadequately addressed to warrant a full Environmental Impact Report for this project.

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The Biogas Renewable Generation Project may be a worthwhile project but ONLY if it is a temporary solution to process the greenhouse gases that the Scholl Canyon Landfill currently emits; NOT if it is part of a permanent plan to make the area a regional waste management site. The Scholl Canyon Landfill should be closed by 2028. The many reasons (beyond the scope of this comment process) include unstable geology; toxic seepage into ground water; air pollution; degrades vistas; proximity to schools, homes and recreation, as well as fulfillment of a longstanding promise to the community. Thus, consideration of the Biogas Renewable Generation Project should be contingent on an ironclad commitment to close the dump by 2028.

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Thank you for the opportunity to make public comment. I sincerely hope the process will resume in a transparent fashion with all 4 projects being considered together along side a commitment to close the Scholl Canyon Landfill while providing for the needs of Glendale residents. We are at an exciting time with many new technologies becoming available.

37-10

Sincerely,

Linda Goodman Pillsbury  
Linda Goodman Pillsbury, LCSW  
818-522-3952  
[www.lgpillsbury.com](http://www.lgpillsbury.com)

Linda Goodman Pillsbury  
2528 Sleepy Hollow Dr.  
Glendale, CA 91206  
[lindapillsbury@gmail.com](mailto:lindapillsbury@gmail.com)

October 19, 2017

Dennis Joe, Biogas Project Planner,  
Community Development Department, Planning Division Office, 633  
East Broadway, Glendale, California 91206-4386  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe,

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While there is much to say on those issues, I would like to keep my comments brief and address the big picture. There are four projects which Glendale has been moving forward with: 1) this Scholl Canyon power plant (the Biogas Renewable Generation Project), 2) an Anaerobic Digester also at Scholl Canyon, 3) expansion of the Scholl Canyon Landfill, and 4) Repowering of Grayson Power Plant. All these projects are interrelated and therefore should be considered together. All will affect each other, the environment, and the surrounding communities. We should be looking at Glendale's needs and goals as a whole, and how we can best meet them, and it is impossible to do that in a piecemeal way, looking at each project alone.

Separating the projects as is currently being done raises transparency issues. While it may not be the city's intent to obfuscate the issues, there certainly is an appearance of lack of transparency, an appearance that these projects are deliberately being shepherded through to keep the public from seeing the big picture. I am sure that Glendale City government would want a comprehensive and open process that thoroughly addresses all issues.

So my thoughts and positions are:

- 1) All 4 projects should be looked at together and planned together. That includes a comprehensive Environmental Impact Report that addresses all components of the 4 projects.
- 2) There are enough issues in the MND for Biogas Renewable Generation Project that are incompletely or inadequately addressed to warrant a full Environmental Impact Report for this project.
- 3) The Biogas Renewable Generation Project may be a worthwhile project but ONLY if it is a temporary solution to process the greenhouse gases that the Scholl Canyon Landfill currently emits; NOT if it is part of a permanent plan to make the area a regional waste management site.
- 4) The Scholl Canyon Landfill should be closed by 2028. The many reasons (beyond the scope of this comment process) include unstable geology; toxic seepage into ground water; air

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pollution; degrades vistas; proximity to schools, homes and recreation, as well as fulfillment of a longstanding promise to the community. Thus, consideration of the Biogas Renewable Generation Project should be contingent on an ironclad commitment to close the dump by 2028.

Thank you for the opportunity to make public comment. I sincerely hope the process will resume in a transparent fashion with all 4 projects being considered together along side a commitment to close the Scholl Canyon Landfill while providing for the needs of Glendale residents. We are at an exciting time with many new technologies becoming available.

Sincerely,

Linda Goodman Pillsbury

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**From:** [Liz Amsden](#)  
**To:** [Joe, Dennis](#); [Krause, Erik](#)  
**Subject:** Comment on the proposed Scholl Canyon biogas project  
**Date:** Thursday, October 19, 2017 9:11:53 PM  
**Attachments:** [CIS opposing Scholl biogas plant.pdf](#)

---

Dennis Joe & Eric Krause  
 Community Development Department  
 Planning Division Office  
 Municipal Services Building, Room 103  
 633 East Broadway  
 Glendale, California 91206-4386

Dear Sirs;

Please include the comments in the attached letter which was voted upon by the Historic Highland Park Neighborhood Council on October 5<sup>th</sup> and passed unanimously whenever addressing the above issue.

The body of the letter is set forth below in the event a pdf can not be entered into comment.

Thank you for your attention to this.

The Historic Highland Park Neighborhood Council which represents over 60,000 Los Angeles stakeholders who reside, own property, or conduct business in our neighborhood calls on the City Council to immediately join with Councilmembers Huizar and demand Glendale require an EIR on the impact of the construction and operation of the proposed biogas plant at the Scholl Canyon landfill for northeast Los Angeles BEFORE any further steps are taken in connection with this project.

Three years ago our Neighborhood Council joined with Councilmember Huizar and many other organizations in the northeast to oppose the unnecessary expansion plans for the **Scholl Canyon Landfill**, located just behind the hills above the 134 Freeway and accessed via Figueroa Street near the Eagle Rock Recreation Center. While the Scholl dump is on the outskirts of Glendale, it overlooks northeast Los Angeles and any changes there affect our neighborhoods' health, safety, and economy. Glendale's Environmental Impact Report totally ignored Los Angeles stakeholders and focused only on the impacts on Glendale's air, water, views, and traffic.

And now a new plan for a "Biogas Renewable Generation Project" – an on-site processing plant for the natural gas produced by the existing garbage in the dump – was set to have its comment period close on September 30<sup>th</sup>. But Councilmember Huizar and his staff have secured a 21-day extension. For this they have our thanks.

This new project is listed as in the 90041 zip code yet there has been no outreach to the organizations representing the interests of Eagle Rock stakeholders.

As with the dump expansion there are serious concerns about air quality – especially toxic particulate matter, groundwater contamination, noise, and aesthetics (since the proposed location above Eagle Rock already has visible lights and trailers) both during and after the construction period. The location will probably have to be significantly expanded to

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accommodate the water tanks and the lights and noise will be an ongoing concern for Eagle Rock since it appears that the power plant will operate 24-7.

The sole access point is at the northern end of Figueroa, adjacent to homes, schools, a major City park, and a historic cultural monument – all in the City of Los Angeles so City stakeholders bear a significant burden from the current operation of the landfill, including trash and debris, pollution, traffic, and deteriorating road conditions in the area around the entrance to the landfill.

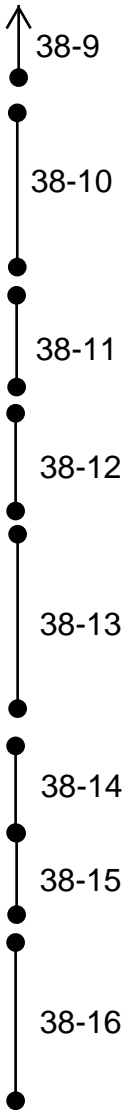
The construction itself which will take more than a year will further exacerbate the use of the Figueroa corridor since the Glendale City Council refused to allow dump trucks to use the Glenoaks Blvd access many decades ago.

Meanwhile the dump continues to percolate known carcinogens and other toxic chemicals through the fractured bedrock below it into the groundwater west of the landfill adjacent to City water supplies.

Pollution doesn't just stop at the border of Glendale or even Eagle Rock. The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipelines rupture, the gas and explosions won't magically stop at a city line; if there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected.

A competent EIR addressing the concerns of northeast Los Angeles will show the landfill is unsustainable under any circumstances, and is irreconcilable with our vision of a greener California. Right now, Los Angeles needs to call on Glendale to shut the dump down and focus on clean up and remediation along our shared border. The first step is to stop further investment which will drive dump expansion.

The Historic Highland Park Neighborhood Council commends Councilmember Huizar for his initial action and requests that the Mayor and City Council join him in protecting the health and quality of life for Angelenos in Highland Park and the other communities of northeast Los Angeles by taking all steps necessary to demand a Los Angeles-centric EIR and stop Glendale moving forward with this project.





# CITY OF LOS ANGELES

CALIFORNIA

## HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL

Post Office Box 50791  
Los Angeles, CA 90050  
<http://www.highlandparknc.com>  
Certified as NC #33 May 28, 2002

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Daniel Andalon FIRST VICE PRESIDENT  
Antonio Castillo SECOND VICE PRESIDENT  
Joan Potter TREASURER  
Rocío Rivas SECRETARY

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Yolanda Nogueira, Diego Silva, Jamie Tijerina



## DEPARTMENT OF NEIGHBORHOOD EMPOWERMENT

200 N. Spring St. Ste. 2005  
Los Angeles, CA 90012  
Telephone: (213) 978-1551

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Jamie Tijerina CULTURE AND EQUALITY  
Gabriel Chabran ARTS  
SuzAnn Brantner SUSTAINABILITY

## Historic Highland Park Neighborhood Council

October 5, 2017

Mayor Eric Garcetti & the Los Angeles City Council  
200 N. Spring Street  
Los Angeles, CA 90012

cc: Los Angeles Energy, Climate Change and Environmental Justice Committee  
City of Glendale City Council and Glendale Department of Water and Power

Re: Stop Glendale from building a new biogas plant at the Scholl Canyon landfill

The Historic Highland Park Neighborhood Council which represents over 60,000 Los Angeles stakeholders who reside, own property, or conduct business in our neighborhood calls on the City Council to immediately join with Councilmembers Huizar and demand Glendale require an EIR on the impact of the construction and operation of the proposed biogas plant at the Scholl Canyon landfill for northeast Los Angeles BEFORE any further steps are taken in connection with this project.

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## HPNC - Stop Glendale from building a new biogas plant at the Scholl Canyon landfill

And now a new plan for a "Biogas Renewable Generation Project" – an on-site processing plant for the natural gas produced by the existing garbage in the dump – was set to have its comment period close on September 30<sup>th</sup>. But Councilmember Huizar and his staff have secured a 21-day extension. For this they have our thanks.

This new project is listed as in the 90041 zip code yet there has been no outreach to the organizations representing the interests of Eagle Rock stakeholders.

As with the dump expansion there are serious concerns about air quality – especially toxic particulate matter, groundwater contamination, noise, and aesthetics (since the proposed location above Eagle Rock already has visible lights and trailers) both during and after the construction period. The location will probably have to be significantly expanded to accommodate the water tanks and the lights and noise will be an ongoing concern for Eagle Rock since it appears that the power plant will operate 24-7.

The sole access point is at the northern end of Figueroa, adjacent to homes, schools, a major City park, and a historic cultural monument – all in the City of Los Angeles so City stakeholders bear a significant burden from the current operation of the landfill, including trash and debris, pollution, traffic, and deteriorating road conditions in the area around the entrance to the landfill.

The construction itself which will take more than a year will further exacerbate the use of the Figueroa corridor since the Glendale City Council refused to allow dump trucks to use the Glenoaks Blvd access many decades ago.

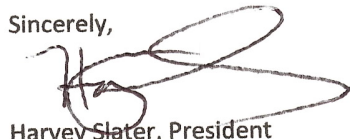
Meanwhile the dump continues to percolate known carcinogens and other toxic chemicals through the fractured bedrock below it into the groundwater west of the landfill adjacent to City water supplies.

Pollution doesn't just stop at the border of Glendale or even Eagle Rock. The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipelines rupture, the gas and explosions won't magically stop at a city line; if there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected.

A competent EIR addressing the concerns of northeast Los Angeles will show the landfill is unsustainable under any circumstances, and is irreconcilable with our vision of a greener California. Right now, Los Angeles needs to call on Glendale to shut the dump down and focus on clean up and remediation along our shared border. The first step is to stop further investment which will drive dump expansion.

The Historic Highland Park Neighborhood Council commends Councilmember Huizar for his initial action and requests that the Mayor and City Council join him in protecting the health and quality of life for Angelenos in Highland Park and the other communities of northeast Los Angeles by taking all steps necessary to demand a Los Angeles-centric EIR and stop Glendale moving forward with this project.

Sincerely,



Harvey Slater, President  
Historic Highland Park Neighborhood Council

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2531 Gardner Place  
Glendale, California 91206  
October 19, 2017

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Mr. Dennis Joe, Planner  
City of Glendale, Community Development Department  
633 East Broadway, Room 103  
Glendale, California. 91206

RE: MND for the Biogas Renewable Generation Project

Dear Mr. Joe:

I am requesting a full environmental impact study for the City of Glendale's Biogas Renewable Generation Project because I believe the analysis accompanying the MND is not as complete and comprehensive as possible to justify truncating the CEQA process by issuing an MND. There is sufficient evidence to support a fair argument that the mitigation measures may not achieve the goal of reducing impacts below a level of significance. In addition, the cumulative impacts of three closely related projects; landfill expansion, development of an anaerobic digestion project on the landfill, and rebuilding the Grayson Power Plant, are not adequately considered in this MND. A power plant should process the greenhouse gases Scholl Canyon emits but NOT enable building a larger, permanent regional waste management industry on the landfill. A power plant should be built with the intention of landfill closure.

I have lived in Glendale for about 30 years, the majority of which have been in Glenoaks Canyon within a mile and a half of Scholl Canyon Landfill. Although I am neither a landfill nor a power plant expert, I know fundamentally the lived experience of seeing my family's quality of life and property values threatened by the City's decisions regarding the landfill. Had we known when we purchased our home that the landfill was still active and that there was not a REAL intention to close the landfill, although there was a Joint Powers Agreement in place, we would probably have looked elsewhere for a home. We've since learned so much more about the dump. It is unlined, within 0.3 to two miles of four earthquake faults, emits fugitive GHG, and is surrounded by residential communities and recreation areas. We've also learned that the City views it as a "resource" (Mr. Ohoa's term) for the future. We view it as a threat and the City's lack of transparency surrounding developments on the landfill has not allayed our concerns.

The MND presents the Biogas project as though it were relatively isolated from the landfill, from other projects being planned for Scholl, and from nearby communities. In fact, the power plant would serve a regional municipal solid waste landfill that is closely surrounded by densely populated residential neighborhoods as well as groups who use the Rose Bowl complex, Cal Arts, Dahlia Elementary School, Glenoaks School, Adventist Hospital, etc. — the list of "sensitive receptors" within two miles of the landfill

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is long. The MND does not fully acknowledge possible impacts on these communities, other than Glendale.

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**The potential impacts of the power plant should not be assessed in isolation. The project will contribute to cumulative impacts of several projects now in various stages of development for the landfill and for Grayson Power Plant.**

The power plant alone will have impacts on the environment, and when taken together with closely linked projects, the impacts could be amplified. Two main projects under development for Scholl Canyon are landfill expansion and an anaerobic digester, and although both projects were mentioned in the original RFP for the power plant and in the DEIR for Repowering Grayson, they are not addressed in this study.

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#### **Landfill expansion:**

- **Two alternatives** have been on hold for more than a year as the City reviews responses to hundreds of public statements on the project's draft EIR. In the meantime, the Sanitation Districts of Los Angeles (the landfill operators) continue to list Scholl Canyon expansion as a goal in their 2015 Annual Report: County of Los Angeles Countywide Integrated Waste Management Plan. The Glendale City Council has not yet voted to approve or reject the EIR, so expansion remains a possibility. Under its current license, without expansion, the landfill is permitted to grow about another 225 feet to 1,525 feet (about 15 stories). A landfill that high will have a significant impact on the environment.

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- Why plan for landfill **expansion** when the Governor of California and the state legislature have set a course to **reduce the amount of landfill waste and drastically cut greenhouse gases**? AB939 aims to divert 50% of organic waste from landfills, and only 10% of the diversion can come from biomass transformation. Executive Order B-30-15 calls for a reduction in greenhouse gases to 40% below 1990 levels by 2030.

39-10

#### **Anaerobic Digestion:**

- **Plans for an anaerobic digestion facility are underway, but specific details are not easily available to the public.**
- The City issued a Request for Proposals in March, 2013, and two companies, Waste Resources, Inc. and Organic Waste Systems, were granted an exclusive negotiating agreement to develop this project as a joint venture. The MND report does not explain how the power plant will link with the anaerobic digestion operation even though the purpose of an anaerobic digester is to convert organics into methane for a power plant.

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**Air Quality: The MND underestimates the impacts of the proposed project on air quality and raises three serious air quality issues.**

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- **The project will emit more criteria pollutants than are permitted by the South Coast Air Quality Management District (SCAQMD).**

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Criterion Air Pollutant	Amount emitted	Amount allowed (SCAQMD)
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NO2	165 lbs/day	55 lbs/day
-----	-------------	------------

CO	919 lbs/day	550 lbs/day
----	-------------	-------------

VOC	114 lbs/day	55 lbs/day
-----	-------------	------------

PM2.5	58 lbs/day	55 lbs/day
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(NO2=nitrogen dioxide, CO= carbon monoxide, VOC= Volatile Organic Compounds; PM2.5 = fine particulates and dust).

- The City proposes to obtain Priority Reserve credits to offset the impact of these pollutants. This is tantamount to buying the right to pollute and does not mitigate the pollutants' impacts. In addition, SCAQMD does not issue the "offset" credits for CO or PM2.5, and offsets will not change the fact that the plant's emissions will exceed SCAQMD thresholds for acceptable levels. Credits traded on paper do not remove pollutants from the air people breathe. The report does not adequately factor in the emission of pollutants from the existing landfill nor does it take into account the emissions from the proposed landfill expansion and the planned anaerobic digester. The study needs to assess the cumulative environmental and health effects from the multiple projects the City plans to build. The expansion DEIR already concluded that expansion would create "significant adverse air quality even with mitigation."

- The air modeling study used to determine criteria pollution may not be reliable.**
- To assess the impact of a power plant on ambient air quality, the study uses two air monitoring stations, one located in Pasadena, four miles from the landfill, and one located in Los Angeles, six miles from Scholl. There are no monitors within two miles of the landfill, and there is no attempt to identify conditions that could affect air quality between Scholl and the two sensors. By adding the numbers from the two monitors to the power plant emissions, the study calculates the total emissions and then compares those totals to a limiting standard. However, the combined values do NOT measure the air pollutant levels at the landfill's boundaries as claimed. There is no way to tell if the emissions at the landfill already exceed the CAAQ standards before the project is built or if there will be any changes after it is built. In 2011, PM2.5 numbers exceeded standards on at least 45 days when measures were taken, and PM10 numbers exceeded standards on at least 64 days.

- Relocating the power plant from Grayson will add to the air pollutants that tens of thousands of people who live, work, and play within less than two miles of the landfill already experience.

- The project's four reciprocating internal combustion engines have a capacity to burn 5,532 cubic feet per minute (scfm), while the MND reports that the landfill produces about 5,000 cubic feet per minute. The models do not appear to take into account "fugitive" gas or leaks from gas pipes. What proportion of the landfill gas is currently flared? Twelve flaring units will remain on the landfill, so to what extent will flaring continue after the power plant is built? Will flaring be an open system or a closed system which results in less noise and light pollution? If an anaerobic digestion

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system is built, will additional engines be required? How will this affect air quality? How will the new plant be integrated with a cost-effective leak detection and pipe integrity monitoring system for both the closed and active parts of the landfill?

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- Exactly how and where will transmission lines connect the new power source to the existing lines?

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**Aesthetics: the MND does not take into account aesthetic impacts beyond the landfill's immediate boundary.**

39-21

- The report does not mention that the Rim of the Valley Corridor Preservation Act would expand the boundaries of the Santa Monica Mountains National Recreation Area to include the San Rafael Hills surrounding the landfill.
- Map 4-25 in the MND report states, "Scholl Canyon is not a primary or secondary ridgeline (City of Glendale, 1993), and therefore is characterized as an area of 'low visual sensitivity.'" However, the recent slope repair project and growing berms have become highly visible to residents in Glenoaks Canyon and Rancho San Rafael. How will their aesthetic enjoyment of the environment be further compromised by landfill projects as a whole?
- There is no mention of the impact the project might have on recreational facilities in Eagle Rock adjacent to the landfill such as the Richard Alatorre Park, the Eagle Rock Canyon Trail, and the Eagle Rock Hillside Park or even the Scholl Canyon recreation facilities adjacent to the landfill. Nor does the report take into account the westward views from the Linda Vista area in Pasadena or possible impacts on the heavily used Rose Bowl recreation area.
- The study does not specify methods that would ensure that lighting would not be intrusive to those living downslope from the power plant. Aiming lights toward the ground would not alleviate downslope intrusiveness.

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**Hazards and Hazardous Materials:**

- More than 1000 vehicles enter the landfill and unload approximately 800 tons of waste per day. Although Scholl is not classified as a hazardous waste facility, hazardous materials inevitably enter the landfill. The loads of fewer than 10 trucks a day are checked at random for hazardous materials, while a majority of the waste is dumped and quickly covered and compacted. The report does not give an estimate of how much material such as hydrocarbons, flammable refuse, poisons, corrosive cleaning materials, asbestos, etc. probably go undetected into the landfill.
- The landfill was opened in 1961, at least 11 years before the EPA was established. In 1976 the Resource Conservation and Recovery Act began managing hazardous waste, so for at least 15 years any manner of hazardous material was deposited in Scholl Canyon, which has never had a lining now required of municipal solid waste facilities.

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- When hazardous materials are found, they are placed in a holding area awaiting transfer to a designated hazardous waste facility. Where is the holding area in relation to the proposed power plant, and how long do these materials sit at Scholl? If there were a fire or an earthquake, how would the power plant and Cal Edison's high tension wires be shielded from the hazardous materials? How will the facility ensure that toxic spills do not occur?

39-28
- The power plant itself may be the source of dangerous materials. Landfill gas must be cleaned of water, impurities, and any gasses other than methane. Will the gas scrubbing process rely on large amounts of chemicals such as ammonia? If so, where will the chemicals be secured? How would spills affect the power plant and nearby sensitive receptors?

39-29
- Power plants, power lines, methane, and flaring bring the risk of fire and explosion, and it is not clear how the new gas line will be made safe. The landfill lies within an area designated as having the highest risk of fire. It is included in the California Fair Plan for insurance purposes. Although the surface of the active landfill is cleared of vegetation, the surrounding hills and nearby neighborhoods are not, nor are the exposed sides of the landfill, where fire resistant indigenous plants have been replaced with flammable grasses. Dry brush, grasses and trees are everywhere in the adjacent canyons and neighborhoods. The winds blow, and fires move. Having a 60,000 gallon tank of water which is used for multiple purposes does not adequately reduce the risks of fire which could spread to the surrounding hills.

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- An "additional 12-inch water line is to be constructed from an existing 16-inch water line for fire hydrants." The report does not explain why a smaller line is dedicated to fire fighting. Where are the hydrants with respect to the power plant?

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- The Los Angeles County Operational Area Disaster Routes identified for the City of Glendale are SR-134, Colorado Boulevard, and Figueroa Street (where Figueroa Street connects to Scholl Canyon Road.) The project may interfere with these routes. If there were an explosion or a fire from the power plant, the high tension wires, the proposed anaerobic digester, the flaring station or any combination of these, the major disaster routes could be compromised. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon, and Linda Vista have very narrow one-way-in-one-way-out streets that could also prove dangerous in case of a major incident at Scholl Canyon.

39-32
- Water:**

• Will water be used in the gas scrubbing process? If so, how much and how will it be cleaned before being sent through the city's sewer system?

39-33
- Operational water consumption is projected to be about 450 gallons per day, which significantly increases water demand when the project is in place. Why will so much more water be required, and how will water be provided?

39-34



- The Pasadena Non-Potable Water Project (February, 2016) will cooperate with Glendale to place 4 non-potable water storage facilities at Scholl Canyon with a connection to the power grid on the landfill. This project is not mentioned in the MND. How will the Pasadena project's water tanks relate to the power plant project?

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#### **Geology:**

- Scholl Canyon is a 56-year old unlined municipal waste facility located on highly fractured, shattered bedrock. It operated for almost 15 years before the Environmental Protection Act, so there were few if any controls over the material deposited in the landfill. There is continuing evidence that volatile organic compounds and other contaminants have seeped below the subsurface barriers and have flowed to the west of the landfill.

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- The report shows six active faults within 10 miles of the project site. The Verdugo fault is 0.3 mile away, and three others are less than 5 miles from the project. All six faults have a magnitude maximum estimate of 6.7 to 7.2 (2008 National Seismic Hazards maps, USGS, 2008). What specific mitigations will the project make to prevent gas and water line breaks, slides on exposed faces of the landfill, and liquefaction at Scholl Canyon Park, also the site of the proposed gas link?

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- The report states, "Landslide hazard zones are most likely on the steep slopes upon which Scholl Canyon Road is located." No mitigation is offered to protect customers and emergency responders on that road in an earthquake or fire emergency when it might be difficult to reach the power station.

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**The Scholl Canyon Landfill should be closed by 2028. Only its closure will motivate the city to deal with reducing waste and implementing modern alternatives for both waste management and energy production. A methane driven power plant should be built with the ultimate goal of landfill closure.**

39-39

Why is the city trying so hard to maintain this antiquated, unhealthy, inherently unsafe technology? We see it as an anachronistic failure to recognize that the future must deal with trash much differently. We are stuck with methane for decades to come, and the longer the dump remains open and continues to grow, the farther away that closure horizon recedes.

39-40

Very truly,



Marie Freeman

Glendale resident and Glenoaks Canyon Homeowners Association

*MFreeman304@gmail.com*

# MICHAEL MALLORY

2317 Blackmore Drive, Glendale, California 91206 • Phone: (818) 244-4030

E-mail: michael2mallory@gmail.net

40

October 19, 2017

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206

Dear Mr. Joe:

As a longtime resident of Glenoaks Canyon, which abuts the titanic pile of fetid garbage known as the Scholl Canyon landfill, I am greatly concerned about steps the city of Glendale seems insistent upon taking to turn this blight into a full-fledged ecological disaster. The following comments are in response to the Mitigated Negative Declaration for the Biogas Renewable Generation Project.

40-1

## 1. Air quality will suffer.

The proposed power generator planned to be erected on the site will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). No matter what paperwork tricks are done in the way of "credits" in an attempt to mitigate this, the air will be unhealthy. Furthermore, the study proposes that during construction, the transport pipes currently in place to remove methane from the site will be disconnected for upwards of a year and a half, during which time the methane will be flared.

40-2

Glendale's new motto could be: "Hey, We Smell Worse Than Carson!"

## 2. Hazards abound.

In the news this very moment are stories of two explosions at two different gas refineries. Is it a guarantee that any power plant built above the landfill will someday explode? Of course not. But it could. Power plants, power lines, and methane flaring bring the risk of fire and explosion. Residential communities (including mine) surround the landfill, which is already in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. Past brush fires in Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have shown how difficult it is to evacuate the area, given the very narrow one-way-out roads. In a major catastrophe, people would die. The *only* 100% guarantee is that if *no* power plant is built atop the landfill, it *will not* explode.

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### 3. Geologic faults

There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play.

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### 4. Cumulative Impacts

The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. And having some city underling get up at a council meeting and declare that "no unexpected significant adverse impacts are envisioned"...well, there's a word for that. It smells almost as bad as a methane plant.

40-6

The City Council of Glendale has two choices: it can honor a commitment made to the citizens years ago to shut down and cover over the landfill once it has grown to capacity, or it can ignore all studies and facts that point out how a proposed methane plant will adversely affect the communities living around it, and use money as a rationale to plant the seeds of its own, home-grown Aliso Canyon disaster.

40-7

I encourage the City to do the right thing and shut down the landfill.

40-8

Sincerely,



Michael Mallory

ecc: V. Gharpetian, A. Jarian, P. Devine, Z. Sinanyan, V. Janian

**From:** [Miri Day Hides](#)  
**To:** [Joe. Dennis](#)  
**Subject:** biogas no!!!  
**Date:** Thursday, October 19, 2017 3:26:47 PM

---

I'm an eagle rock homeowner. my husband and I strongly oppose the building of the biogas plant or anything else in Scholl Canyon. We don't want your project in Eaglerock. It will be detrimental to our quality-of-life thank you

best  
Miri and andrew hides

Sent from my iPhone

41-1

**From:** [Monica Cheang](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Thursday, October 19, 2017 9:55:53 PM

---

42

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### **Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

42-1

42-2

42-3

### **Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

42-4

42-5

### **Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

42-6

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Monica Cheang @2128 E Glenoaks Blvd, Glendale  
Scholl Canyon resident

Sent from my iPad



**From:** [Peter Finestone](#)  
**To:** [Suzanne Smith](#); [Joe. Dennis](#)  
**Cc:** [Councilmember José Huizar - Northeast LA](#); [board@ernc.la](#)  
**Subject:** Re: Scholl Canyon Dump  
**Date:** Thursday, October 19, 2017 8:12:23 PM

---

ty s smith

On Thu, Oct 19, 2017 at 6:48 PM Suzanne Smith <[sjbirder@roadrunner.com](mailto:sjbirder@roadrunner.com)> wrote:

Dear Mr. Joe,

I am writing to ask you to put a halt to consideration of this issue until the City of Glendale reaches out to the residents of Eagle Rock, who are directly affected by the dump.

43-1

This will affect us far more than most people in Glendale. However, it appears that there has been no EIR done to determine how the biogas project will affect our community. It is outrageous that you attempted to sneak this by our local council office, The Eagle Rock Association, and the Eagle Rock Neighborhood Council, all of whom raised significant concerns about your plans for expansion of the dump several years ago.

43-2

I am therefore asking that you

1) HALT consideration of the biogas issue until further notice;

43-3

2) Work with the above mentioned groups to hold a Q&A for Eagle Rock residents and others; and

43-4

3) Commit to an EIR for the LA areas that currently adjoin the dump.

43-5

I look forward to hearing your response.

Suzanne Smith  
 Eagle Rock resident and Faith Based Groups  
 Director for the Eagle Rock Neighborhood Council

Sent from [BlueMail](#)

--

Peter Finestone

From: [R Kataoka](#)  
 To: [Joe. Dennis](#)  
 Subject: Submission of Public Comment for Biogas Renewable Generation Project MND  
 Date: Thursday, October 19, 2017 11:57:04 PM

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### **Air Quality**

1. I play rounds of golf at School GC twice a week and practice routinely there. Having a power generator nearby would not improve the experience – noise/smell/air quality.
2. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
3. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 4 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

### **Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

### **Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

### **Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,

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44-8

Public Comments, Mitigated Negative Declaration  
Biogas Renewable Generation Project  
7721 N. Figueroa St., Los Angeles, CA

Submitted by: Sharon Landin  
smlandin2@gmail.com  
2420 Hollister, Terr., Glendale, CA

## **Air Quality**

### **3.31 Setting**

#### **Existing Site Conditions**

The description of the setting as well as the aerial pictures in the MND omit large swaths of neighborhoods and communities. The MND states, "The landfill surrounding the Project site is flanked to the west by 2 parks, Lower School Canyon Park and Eagle Rock Hillside Park; to the south by the Ventura Freeway (California State Route 134); and to the east by the Rose Bowl Stadium." While this is true, it overlooks the 4-5,000 residents who live in Eagle Rock to the south, the 2-2,500 residents who live in Glenoaks Canyon to the southwest, the residents in Chevy Chase Canyon and the Art Center Campus to the north, and the 3,000-4,000 residents in the Linda Vista area and Glen Oaks Development (these neighborhoods are closer to the Project Site than the Rose Bowl) to the east. (See attached maps)

45-1

#### **3.3.1 Regional Climate**

Relevant wind patterns are not included. The winds usually blow west to east and north to south. Given the close proximity to several neighborhoods, the criteria pollutants from the power generators could have a significant impact on them. Additionally, the generators are located above the Glenoaks Canyon neighborhood, and a canyon can serve as a funnel for these emissions.

45-2

#### **3.3.20 Construction Impacts Due to Landfill Gas**

##### **Table 3.3.9 Overall Air Quality Impact Due to Construction of the Project**

In this section, the "Net Emission" was calculated by adding the "CalEEMod Output" to the "Flare Emissions During Construction" and then subtracting the "Existing Baseline of Daily Landfill Gas." As a result, they recorded a net decrease in CO, VOC, PM10, and PM2.5. However, they used 2015 data for the flare emissions and an "average of emission factors" from 2010-2014 data for the "Existing Baseline of Daily Landfill Gas". To be accurate, they should have used data from the same year for both the flare emissions and the existing baseline. Accurate construction impacts are important since the construction period will last 15-18 months. Also, the MND does not state when, how frequently, and how long flaring will occur.

45-3

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##### **Table 3.3-12 Criteria Pollutant Emission Summary – GE J 620 GS-16**

3.3.24 Without the Priority Reserve Credits, NOx, CO, PM2.5, and VOC emissions of the proposed project would exceed the SCAQMD Mass Daily Significance Thresholds for Operation Emissions. (NOx would actually be three times the SCAQMD Mass Daily Significance Thresholds for Operations Emissions; CO would be over one and a half times the thresholds).

45-5

Pasadena (4 miles from landfill) and one in Los Angeles (six miles from the site). The study added the emissions from these two distant monitoring stations to the power generators' emissions to calculate the impact of the generators on the local ambient air quality.

#### Toxic Air Contaminants (TAC)

Page 3.3.44 "TAC emissions associated with the Project will consist primarily of combustion byproducts produced by the electrical generating units. TACs are compounds designated by the California Office of Environmental Health Hazard Assessment as pollutants that may cause a significant health hazard".

EIR Scholl Canyon Landfill Expansion page 6.2.7. "Carcinogens are not assumed to have a threshold below which there would be no human health impact. Any exposure to a carcinogen is assumed to have some probability of causing cancer."

Even though the TACs registered in the studies do not exceed the project increment SCAQMD thresholds, any incremental increase increases the probability for cancer and becomes a significant health threat. Additionally, the cancer risk for the pending landfill expansion exceeds the SCAQMD project increment threshold according to the previous released EIR.

#### Cumulative Impacts

This MND does not address the cumulative impacts on air quality for the "whole project." In other words, in addition to the 12 MW generators, there are pending intertwined projects: an anaerobic digester and a landfill expansion. In fact, the two proposed variations for the landfill expansion both conclude that significant adverse air quality would result even with mitigation. (See attachment 2, Scholl Canyon Landfill Expansion DEIR 8.1.1 & 8.1.2) The MND also does not take into account the pollutant output that will result from the additional 200 foot elevation gain that is allowed under the 1997 Joint Powers Agreement.

#### Recommendations

1. The City should order an environmental impact report on the "whole project" due to the seriousness of the environmental and health consequences that could affect thousands of surrounding residents instead of trying to circumvent CEQA guidelines by piecemealing it into three separate projects. This EIR should be commissioned by a company that does not have an economic interest in the project.
2. The City should have an accessible notification process so all of the stakeholders can comment on this project because it permanently affects our environment and our community.
3. The City should consider options that are more environmentally friendly.
4. The City should propose projects that do not jeopardize the health of its residents.

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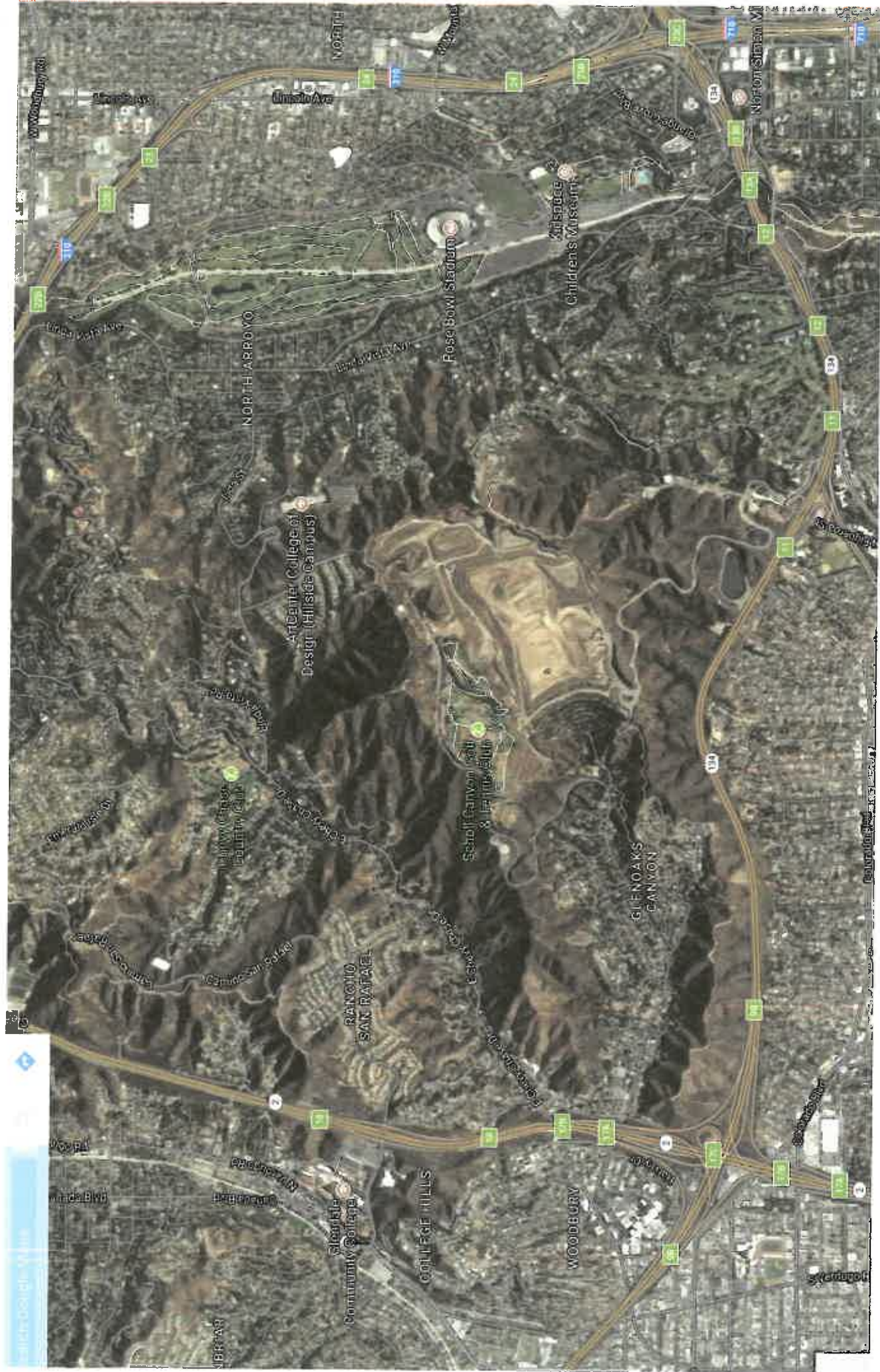
45-10

45-11

45-12

45-13







## 8.0 UNAVOIDABLE ADVERSE IMPACTS

This section summarizes the unavoidable adverse impacts associated with the proposed project. Specifically, Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR):

"Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

Section 6.0 (Resource Specific Analysis) of this Draft EIR (DEIR) documents the analysis of the potentially significant adverse impacts associated with the proposed project. The proposed project would result in unavoidable adverse impacts related to air quality, even after mitigation, as noted in the analyses contained within Section 6.0 of this DEIR.

### 8.1 AIR QUALITY

#### 8.1.1 VARIATION 1

As described in Section 6.2 (Air Quality) of the DEIR, operation of Variation 1 would result in the generation of criteria pollutants that would exceed the South Coast Air Quality Management District's (SCAQMD) mass daily thresholds and localized significant thresholds for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Additionally, because Variation 1 would result in PM<sub>10</sub> emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM<sub>10</sub>, as set forth in the Air Quality Management Plan (AQMP). Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> generated during operation of Variation 1 would not be reduced to below a level of significance. Therefore, implementation of Variation 1 would result in significant unavoidable adverse air quality impacts.

#### 8.1.2 VARIATION 2

As described in Section 6.2 (Air Quality) of the DEIR, "new" construction activities associated with Variation 2 would include the installation of the 13-acre liner, including a geomembrane, geotextile, and drainage layer comprised of sand and gravel, as well as excavation of the hill located in the northern portion of the property. Peak daily construction emissions associated with these activities would exceed the SCAQMD's mass daily threshold and localized significant threshold for NO<sub>x</sub> emissions. Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO<sub>x</sub> generated during Variation 2 construction, would not be reduced to below a level of significance. Therefore, construction of Variation 2 would result in significant unavoidable adverse air quality impacts.

Operation of Variation 2 would result in the generation of criteria pollutants that would exceed the SCAQMD's mass daily thresholds and localized significant thresholds for NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Additionally, because Variation 2 would result in PM<sub>10</sub> emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM<sub>10</sub>, as set forth in the Air Quality Management Plan (AQMP). Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> generated during operation of Variation 2 would not be reduced to below a level of significance. Therefore, operation of Variation 2 would result in significant unavoidable adverse air quality impacts.



**COMMENTS REGARDING THE PROPOSED EXPANSION OF THE SCHOLL CANYON  
LANDFILL, 2017  
GEOLOGIC AND ENVIRONMENTAL HAZARDS**

**OCTOBER 19, 2017**

Clarence A. Hall  
Professor of Geology Emeritus, UCLA  
Licensed Professional Geologist, Certificate Number 2337  
Board for Professional Engineers, Land Surveyors, and Geologists,  
State of California

**INTRODUCTION**

The Scholl Canyon Landfill is currently an environmental hazard owing to: (a) its proximity to an active fault, (b) the presence of hazardous waste in the subsurface, and (c) the absence of a composite liner at the base of the landfill. An expansion of the Scholl Canyon Landfill, e.g., raising the profile of the surface of the landfill 170-180 feet, with contaminants added to the landfill that escape detection, presents a further health risk. Seismic activity could potentially rupture the present subsurface barrier, releasing contaminated fluids into the regional groundwater. In addition, future earthquakes along either proximal or regional faults could damage proposed engineered structures. However, "*The Administrative Draft Initial Study/Mitigated Negative Declaration*, (i.e., Stantec Scholl Canyon Landfill report, July 31, 2017), *Glendale Proposed Biogas Renewable Generation Project, Project documents*, referred to here as **Stantec 2017**, concludes that "potential impacts related to rupture of a known earthquake fault (*referring to the Verdugo fault*) or strong seismic ground-shaking are considered less than significant", and that no mitigation measures are required.

Federal, California State, Los Angeles County, and institutional documents, referenced and referred to below, provide the bases to show that the Scholl Canyon Landfill is currently an environmental hazard. For convenience some references are referred to here as:

**EIR 2003:** 2003 Technical Background Reports City of Glendale CA, Earth Consultants International.

**EIR 2006:** Report: Scholl Canyon Landfill Expansion/Environmental Impact Study August 8, 2006, City of Glendale. EIR 2006.

**SD 2009:** 2009-10 Water Year ULARA Watermaster Report. Scholl Canyon Landfill Expansion EIR. Appendix K.

**EIR 2014:** Scholl Canyon Landfill Expansion, 2014 Draft Environmental Impact Report For The Scholl Canyon Landfill Expansion Volumes 1 & 2, State Clearinghouse No. 2007121023, EIR 2014.

**SD 2016:** First Quarter and Second Quarter 2016 Water Quality Monitoring Report Scholl Canyon Landfill Glendale, California County Sanitation Districts of Los Angeles County 1955

Workman Mill Road Post Office Box 4998 Whittier, California 90607-4998. April and July 2016.

**SD 2017:** First Quarter and Second Quarter 2017 Water Quality Monitoring Report Scholl Canyon Landfill Glendale, California County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Post Office Box 4998 Whittier, California 90607-4998. April and July 2017.

## **BARRIER, GROUND WATER, HAZARDOUS SUBSTANCES**

**Stantec 2017: Page 3.6.1, "Section 3.6, Geology and Soils" of the "Biogas Renewable Generation Project, Administrative Draft Initial Study/Mitigated Negative Declaration"**  
Subheading: "Regional Geology".

**Last Paragraph:** "California Highway 134 is located approximately 0.4 miles southwest of the site".

**My Comments:** Referring to "approximately 0.4 miles": The entrance and address of the Scholl Canyon Landfill is 7721 Figueroa Street, Los Angeles, CA. The entrance to the landfill is approximately **200 feet** north of the Ventura Freeway (California 134) and the Verdugo fault.

In addition: (a) The current and active part of the landfill, at its southern margin, is **1,500 feet** north of California 134 and the Verdugo fault.

(b) A subterranean barrier (**pages 4 5 & 6 below**) is present near the western boundary of the Scholl Canyon landfill or "site". The barrier is intended to block the westward subsurface migration of over 200 chemicals (see the following table). That barrier is **~2,000 feet** north of California 134 and the Verdugo fault (see accompanying maps and figures).

**Stantec 2017: Page 3.6.2 of the Stantec Report: "Local Geology" Stantec 2017: Page 3.6.1:**

"Based on information depicted on the 2005 Geologic Map of Los Angeles, the Project site is underlain by Mesozoic age quartz diorite deposits (sic)..." "Sometimes (sic) referred to as the Wilson Diorite."

**My Comments:** "the 2005 Geologic map of Los Angeles" (referred to above), apparently refers to the "Preliminary Geologic Map of the Los Angeles 30' x 60' Quadrangle", published by the U.S. Geological Survey, and authored by R.F. Yerkes and R.H. Campbell. These two authors reference maps used in their compilation, including several maps authored by T.W. Dibblee.

The Wilson Diorite is a quartz diorite. It is an igneous intrusive rock—not quartz diorite "deposits". Deposits are sedimentary lithology (e.g. made up of clay, silt, sand, or gravel and commonly carried and deposited by wind, water, or ice). The quartz diorite was not "deposited" by sedimentary processes.

The igneous rocks consist of granodiorite, quartz diorite, and/or tonalite. These are intrusive rocks of late Cretaceous age (100.5–66 Ma) that intruded metamorphic rocks, including gneiss or Mendenhall Gneiss, whose age is Proterozoic or greater than 1.2 billion years old.

These igneous and metamorphic rocks are present beneath the Scholl Canyon landfill. In a sense, they are an **environmental hazard** owing to the fact that they are highly fractured. During at least the last 28 million years (28 Ma to Present) these rocks were transported tectonically along and within the San Andreas zone, and other fault systems, i.e., transported at least 350 miles or as much as 20 degrees of latitude. During transportation they were highly fractured and mixed. They form the basement of the landfill. See also **EIR 2003: TECHNICAL BACKGROUND REPORT to the 2003 SAFETY ELEMENT CITY of GLENDALE, CALIFORNIA, CHAPTER 2: GEOLOGIC HAZARDS.**

In sum: In 1961, no impermeable membrane was installed at what was to become the base of the Scholl Canyon Landfill. As noted above, the rocks beneath the base of the landfill are highly fractured igneous and metamorphic rocks largely of two geologic ages (~150 million and 650+ million years or/to 1.2 billion years old) that have been transported and fractured as they were moved at least several hundred miles to their present location, and during at least the last 27 or 28 million years.

**EIR 2014 (part 3.3.7.1):** This section minimizes this environmental hazard: The report states:

"The SCLF was developed and the extent of refuse placement was established prior to Subtitle D regulations requiring installation of a composite liner at the bottom of the landfill. Although the site does not have a composite liner, the existing natural liner of bedrock, the subsurface barrier at the mouth of the canyon, and the groundwater monitoring and extraction systems collectively provide an equivalent level of protection".

**My Comment:** Because there is no "composite liner at the bottom of the landfill" or impermeable barrier beneath the landfill, contaminated fluid has leaked and is currently leaking from beneath the landfill. The contaminated groundwater is carried westward into the aquifer (based on LA County sampling the substrate in wells west of the barrier; see below). **Expansion of the landfill will exacerbate this existing environmental hazard.**

The following maps and tables, **pages 4-10**, support this comment.

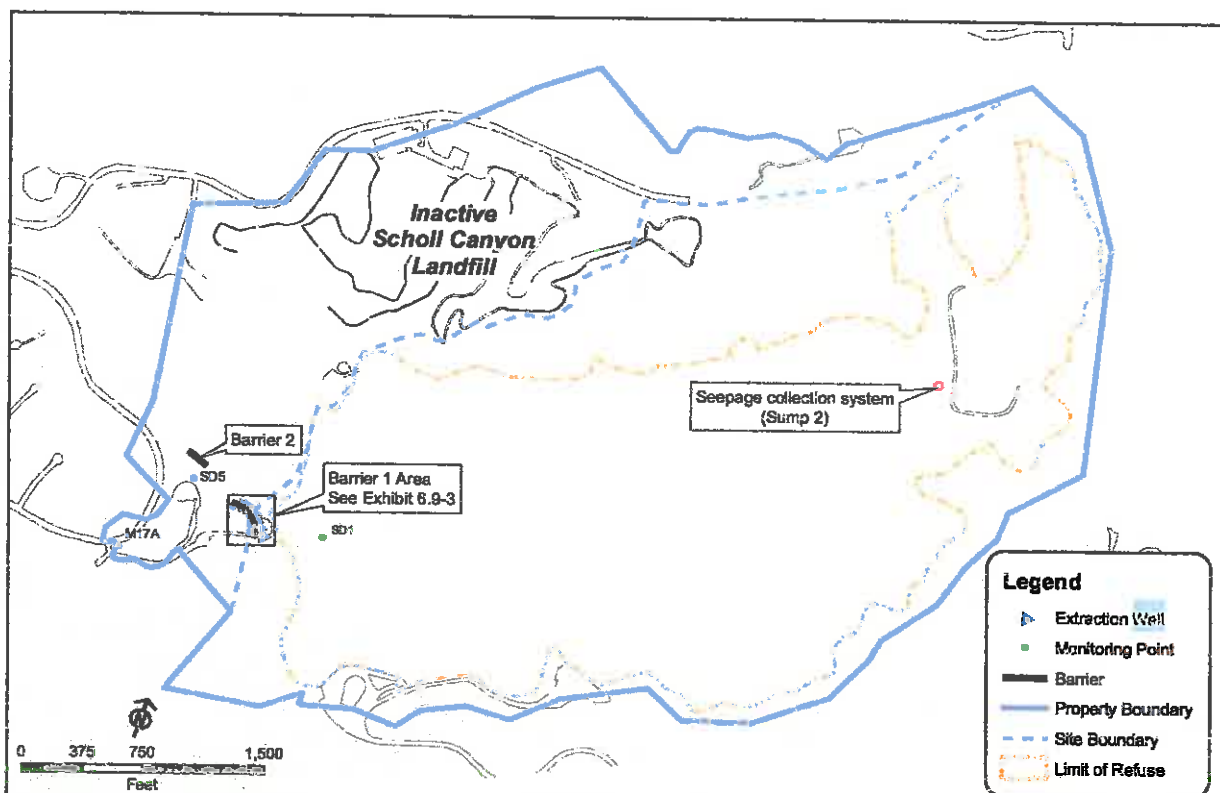
The maps and tables below show the location of the monitoring wells west of the subsurface barrier near the western limit of the Scholl Canyon Landfill, and wells farther west of the barrier at the Glenoaks Park. The presence of chemical elements, and over 200 "constituents of concern", reported from nine monitoring wells (wells M02B, M04B, M05A, M06B, M08B and, M010B) immediately west of the subsurface concrete and bentonite [volcanic ash] barrier, and wells M17A, M18A, and M18B at the Glenoaks Park), clearly demonstrate that the subsurface barrier at the west side of the landfill, and mouth of the canyon, and the groundwater monitoring and extraction systems clearly do not provide protection from environmental hazards owing to: (a) the absence of a composite liner at the base of the landfill, (b) the presence at the base of the landfill of highly fractured igneous and metamorphic rocks that allow hazardous substances to migrate westward beneath the barrier,

and (c) the potential for earthquakes to generate faults (discussed below) that could breach the subsurface barrier.

In addition, rainfall (see rainfall averages for Los Angeles below) eventually percolates downward through the landfill and into: (a) the fractured substrate, (b) the aquifer, groundwater, and (c) Glendale's water wells. Increased rainfall exacerbates percolation of chemical constituents into the groundwater.

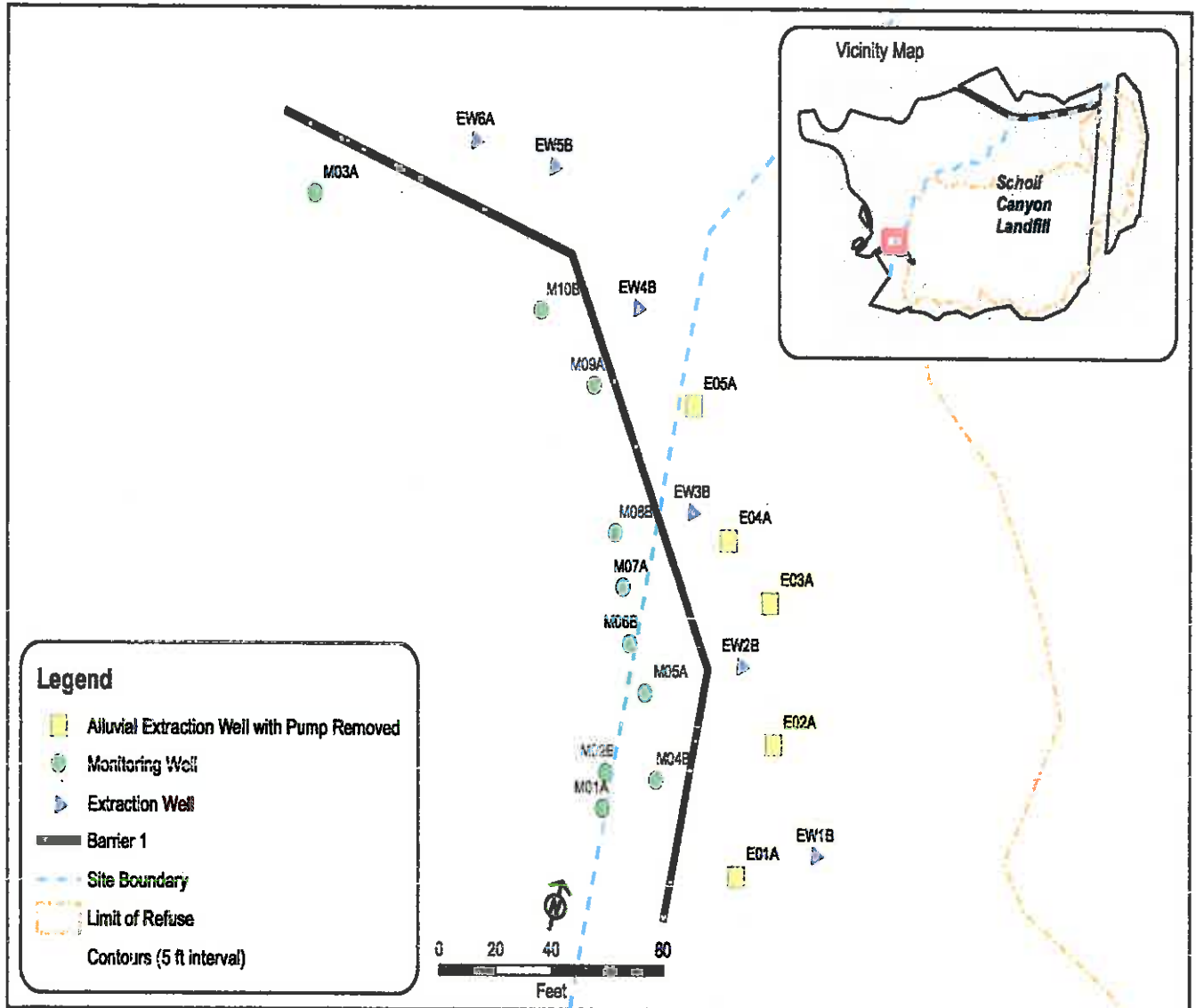
Five-year Average	9.82 INCHES		
Ten-year Average	11.70 INCHES		
Twenty-year Average		13.56 INCHES	
Fifty-year Average			14.69 INCHES
Years from 2016 to 1966			

Note: These rainfall averages are for Los Angeles, CA. The average annual Precipitation for Glendale is 18.96 inches, owing to its proximity to the surrounding mountains and its higher elevation than Los Angeles. A hundred-year-plus data record is available for Los Angeles (average 14.93 inches), but not for Glendale.



Source: County Sanitation Districts of Los Angeles County

**Figure 6.9-2**  
**Monitoring Point Locations**  
**Scholl Canyon Landfill Expansion EIR**



Source: County Sanitation Districts of Los Angeles County

**Figure 6.9-3**  
**Subsurface Barrier 1 System**  
**Scholl Canyon Landfill Expansion EIR**



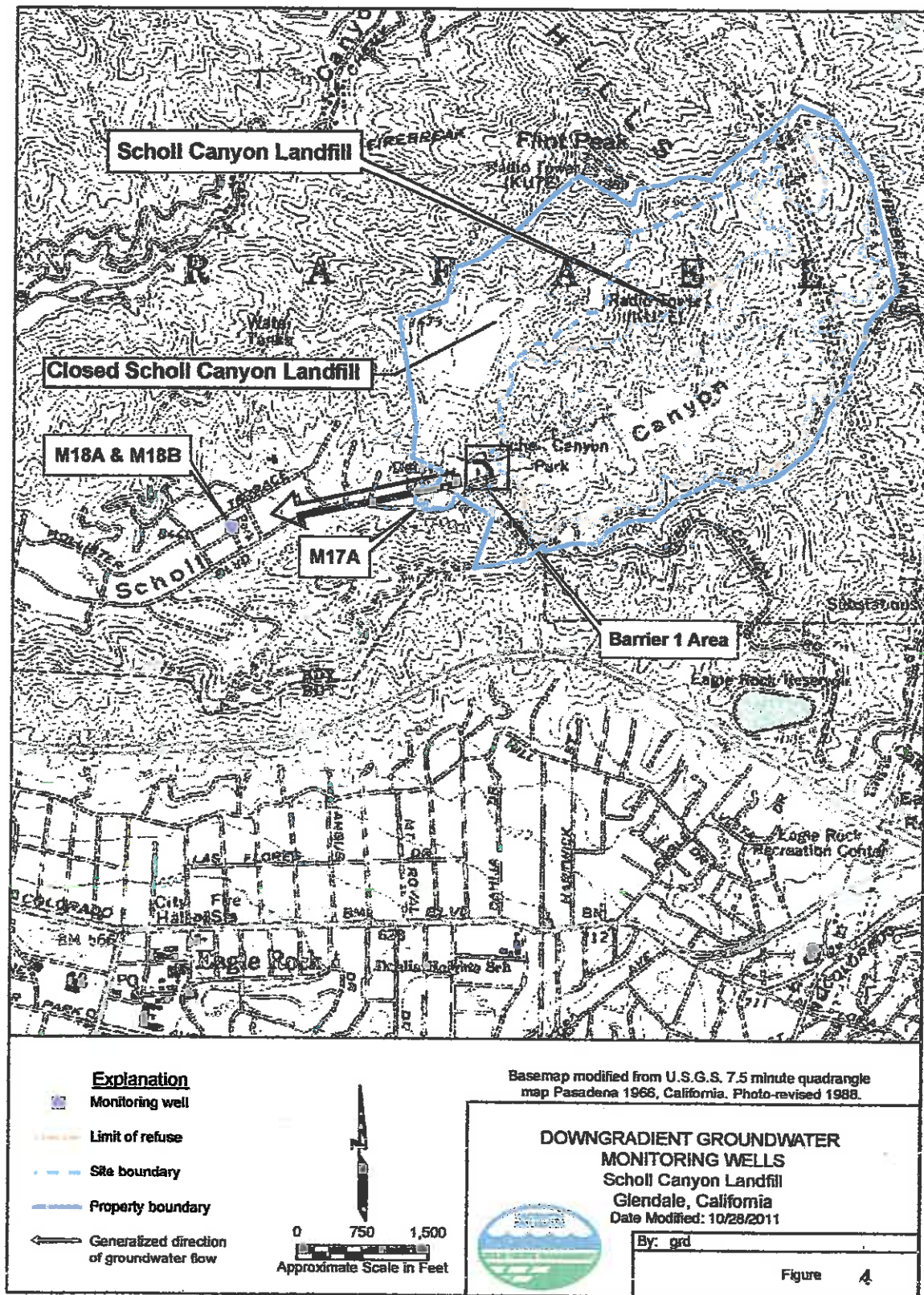








Table 2  
School Canyon Landfill 2009 Groundwater Quality Monitoring Results Range<sup>1</sup>

Capitoli	M021				M028				M030				M031				M032				M033				M034				M035				M036				M037				M038				M039				M040				M041				M042				M043				M044				M045				M046				M047				M048				M049				M050				M051				M052				M053				M054				M055				M056				M057				M058				M059				M060				M061				M062				M063				M064				M065				M066				M067				M068				M069				M070				M071				M072				M073				M074				M075				M076				M077				M078				M079				M080				M081				M082				M083				M084				M085				M086				M087				M088				M089				M090				M091				M092				M093				M094				M095				M096				M097				M098				M099				M100				M101				M102				M103				M104				M105				M106				M107				M108				M109				M110				M111				M112				M113				M114				M115				M116				M117				M118				M119				M120				M121				M122				M123				M124				M125				M126				M127				M128				M129				M130				M131				M132				M133				M134				M135				M136				M137				M138				M139				M140				M141				M142				M143				M144				M145				M146				M147				M148				M149				M150				M151				M152				M153				M154				M155				M156				M157				M158				M159				M160				M161				M162				M163				M164				M165				M166				M167				M168				M169				M170				M171				M172				M173				M174				M175				M176				M177				M178				M179				M180				M181				M182				M183				M184				M185				M186				M187				M188				M189				M190				M191				M192				M193				M194				M195				M196				M197				M198				M199				M200				M201				M202				M203				M204				M205				M206				M207				M208				M209				M210				M211				M212				M213				M214				M215				M216				M217				M218				M219				M220				M221				M222				M223				M224				M225				M226				M227				M228				M229				M230				M231				M232				M233				M234				M235				M236				M237				M238				M239				M240				M241				M242				M243				M244				M245				M246				M247				M248				M249				M250				M251				M252				M253				M254				M255				M256				M257				M258				M259				M260				M261				M262				M263				M264				M265				M266				M267				M268				M269				M270				M271				M272				M273				M274				M275				M276				M277				M278				M279				M280				M281				M282				M283				M284				M285				M286				M287				M288				M289				M290				M291				M292				M293				M294				M295				M296				M297				M298				M299				M300				M301				M302				M303				M304				M305				M306				M307				M308				M309				M310				M311				M312			
	Unità <sup>2</sup>	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No. of Samples	Result Range	No																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										

## **SD 2017: Trichloroethene**

“Trends for the volatile organic compounds (VOCs) were generally consistent with previous results of trend analyses performed for quarterly monitoring events at the SCLF. For the most part, the observed VOC concentrations have decreased or remained stable at most wells. Such trends have been apparent since the installation of the new groundwater extraction wells in 1998. Trend analyses indicate decreasing or stable trends for all the detected VOCs at wells M06B and M08B, for five of the six detected VOCs at wells M02B, and for four of the five detected VOCs at well M04B. Trichloroethene at wells M02B and M04B was identified as showing increasing trends; these wells and trends are discussed below.

### ***Well M02B***

Six of the 10 selected VOCs were detected in well M02B during the reporting period and one increasing trend was identified. **The statistical analyses indicated an increasing trend for trichloroethene. This VOC was detected at 7.4 and 7.6 µg/L in the primary and duplicate samples, respectively, during this reporting period. Trichloroethene has been detected since the third quarter of 1987 and concentrations have ranged from non-detect to 8.5 µg/L.** There are typical indicators of leachate in groundwater such as chloride, nitrate as nitrogen, sulfate, total organic carbon, and total dissolved solids. The concentrations of these indicators at well M02B do not show changes that would correspond with a new release from the landfill.

### ***Well M04B***

## ***Second Quarter 2017 Water Quality Monitoring Report Scholl Canyon Land***

Five of the 10 selected VOCs were detected in well M04B during the reporting period and one increasing trend was identified. **Although the statistical analyses indicated an increasing trend for trichloroethene, this VOC was detected within its historical levels this reporting period at 2.7 µg/L. Trichloroethene has been detected since the first quarter of 1991 and concentrations have ranged from non-detect to 7.5 µg/L.** The detected concentrations of this VOC do not show a steady increase as suggested by the trend analysis, but instead fluctuates from one monitoring event to the next within a band of values.

The Sanitation Districts do not believe these detected trends require any necessary action beyond the site's existing CAP. A discussion of the year's concentration trends at the monitored wells will be included in the 2017 annual water quality monitoring report. In all of the monitoring wells, total VOC concentrations have decreased significantly since the bedrock extraction wells were installed. **These results indicate that the (corrective action program) CAP continues to be effective in controlling landfill-affected groundwater.”**



**My Comments:** There should be public concern owing to the presence of trichloroethylene (TCE) west of the concrete and bentonite barrier.

*From Wikipedia, the free encyclopedia:*

"Pioneered by Imperial Chemical Industries in Britain, its development was hailed as an anesthetic revolution. Originally thought to possess less hepatotoxicity than chloroform, and without the unpleasant pungency and flammability of ether, TCE use was nonetheless soon found to have several pitfalls. These included promotion of cardiac arrhythmias, low volatility and high solubility preventing quick anesthetic induction, reactions with soda lime used in carbon dioxide absorbing systems, prolonged neurologic dysfunction when used with soda lime, and evidence of hepatotoxicity as had been found with chloroform.

The introduction of halothane in 1956 greatly diminished the use of TCE as a general anesthetic. TCE was still used as an inhalation analgesic in childbirth given by self-administration. Fetal toxicity and concerns for carcinogenic potential of TCE led to its abandonment in developed countries by the 1980s.

Due to concerns about its toxicity, the use of trichloroethylene in the food and pharmaceutical industries has been banned in much of the world since the 1970s. Legislation has forced the substitution of trichloroethylene in many processes in Europe as the chemical was classified as a carcinogen carrying an R45 risk phrase, *May cause cancer*. Many degreasing chemical alternatives are being promoted such as *Ensolv* and *Leksol*; however, each of these is based on *n*-propyl bromide which carries an R60 risk phrase of *May impair fertility*, and they would not be a legally acceptable substitute.

Groundwater contamination by TCE has become an important environmental concern for human exposure.

In 2005 it was announced by the United States Environmental Protection Agency that the agency had completed its Final Health Assessment for Trichloroethylene and released a list of new TCE toxicity values.<sup>[6]</sup> The results of the study have formally characterized the chemical as a human carcinogen and a non-carcinogenic health hazard. **A 2011 toxicological review performed by the EPA continues to list trichloroethylene as a known carcinogen."**

## BARRIER, FAULTS

**Stantec 2017: Section 3.6.3 states:** "The project site is not located within a currently mapped California Earthquake fault zone, as presented in the table above; the nearest fault is the Verdugo fault, located 0.3 miles to the southwest of the project site (italics/underline mine). Based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Project site during design life of the proposed development.

The Scholl Canyon faults were mapped by Byer (1968), and Envicom (1975) suggested that this fault connects the Verdugo fault in the west to the Eagle Rock fault in the east. However, more recent mapping by Dibblee (1989) does not even show these faults, and there is (sic) no data to indicate that these fault traces, if even present, are active. The Hazards Map in the GGP (Glendale General Plan) shows the Scholl Canyon fault, as mapped by Byer, on Plate P of the Safety Element of the GGP (City of Glendale, 2003)." End quote.

**My Comments:** Stantec 2017 minimizes the importance of the Verdugo fault. To quote from above: **“there is low potential for surface fault rupture from the Verdugo Fault”**. Because movement within and along the Verdugo fault zone (and along faults mapped within the Scholl Canyon Landfill) could impact any engineered structures at the landfill site, and elsewhere, including the subsurface barrier discussed in my above comments, evidence of the presence of the Verdugo fault, the postulated magnitude of an earthquake near the trace of the Verdugo fault, and the estimated monetary damage that movement along the fault could cause, the Verdugo fault is reviewed below.

**BELOW: Some maps depicting the Verdugo Fault**

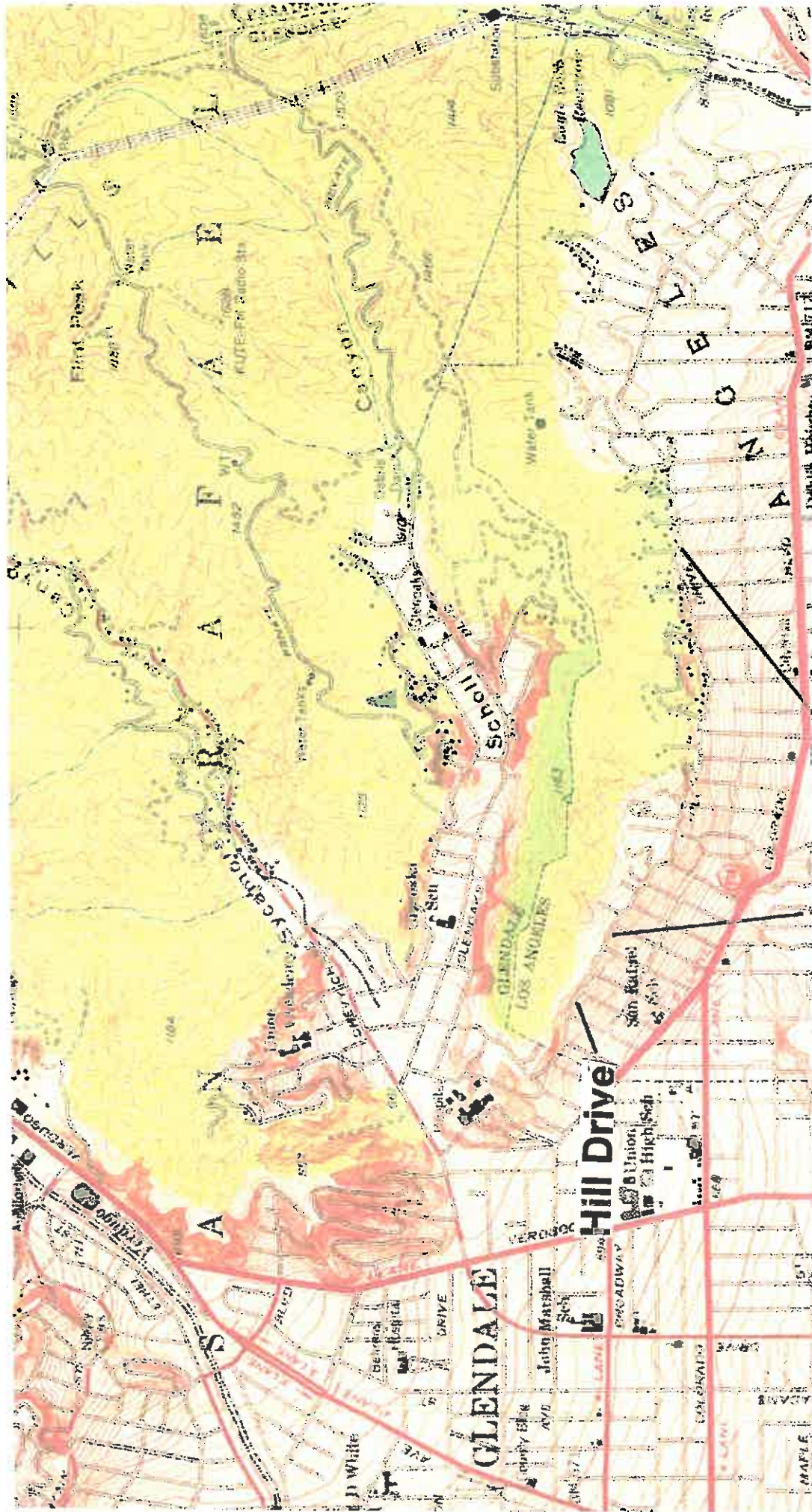
**1. TOPOGRAPHIC MAP (Page 13)**

The Verdugo fault or fault-line scarp is visible on the **1953 edition** (pre-Ventura Freeway, CA 134) of the **7.5 minute Pasadena Quadrangle**. A part of that map is reproduced below. The fault scarp, before excavation for the freeway was along “Hill Drive” (**Page 13**).

**2. GEOLOGIC MAPS (Beginning on Page 14)**



**Scholl Canyon (Glenoaks Canyon) Pasadena Quadrangle 1958**



**Fault Scarp (Verdugo fault)**

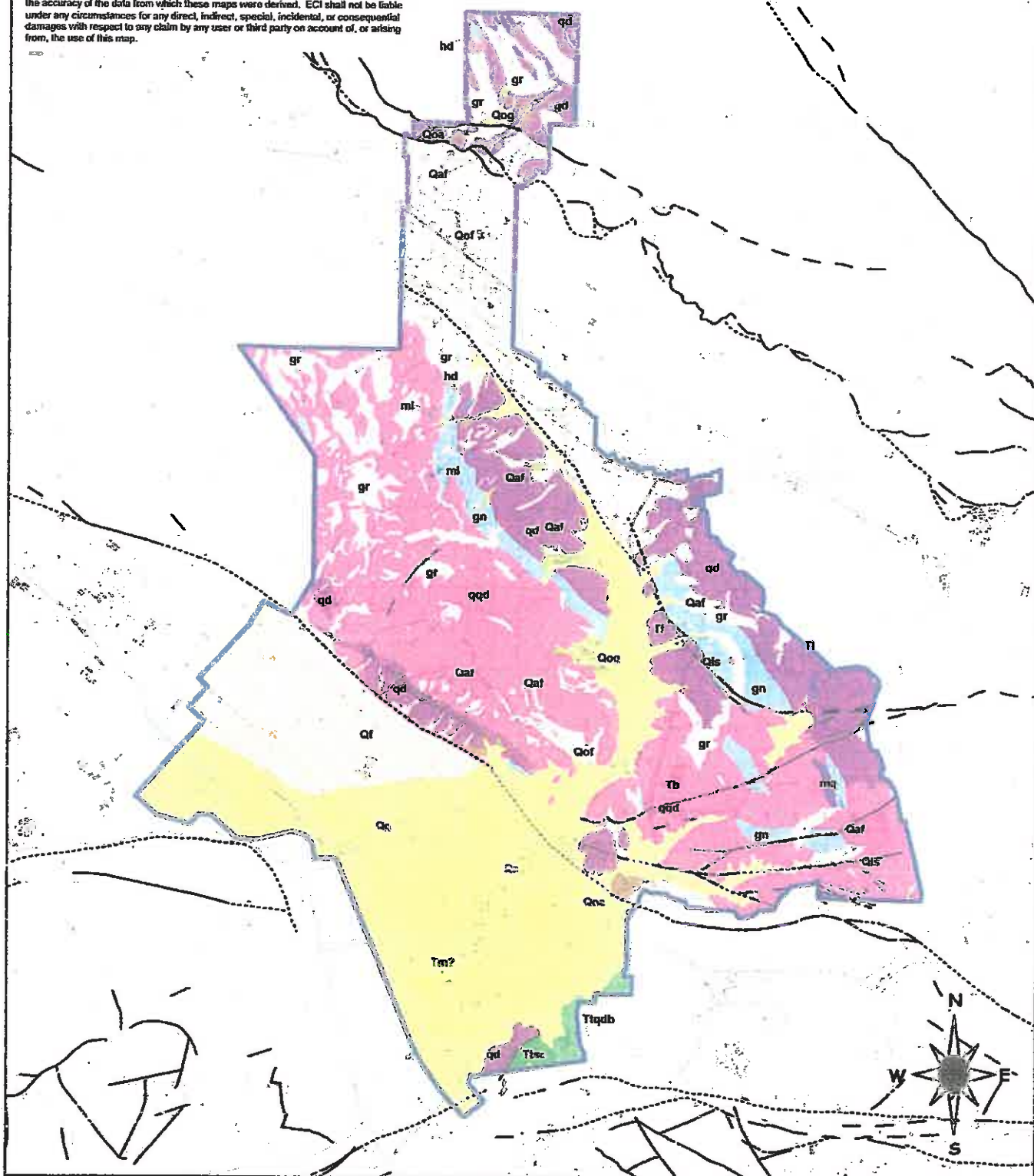


sufficient to serve as a substitute for detailed geologic investigations of individual sites, nor does it satisfy the evaluation requirements set forth in geologic hazard regulations.

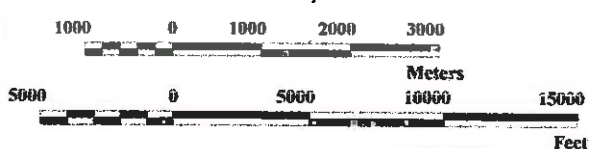
Fault lines on the map are used solely to approximate the fault location. The width and location of the faults should not be used in lieu of site-specific investigations, evaluation, and design.

Detailed geologic investigations, including trenching studies, may make it possible to refine the location and activity states of a fault. All faults may not be shown. This map should be amended as new data become available and are validated.

Earth Consultants International (ECI) makes no representations or warranties regarding the accuracy of the data from which these maps were derived. ECI shall not be liable under any circumstances for any direct, indirect, special, incidental, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of this map.



Scale: 1:60,000



Base Map: USGS Topographic Map from Sure!MAPS RASTER  
Sources: Weber, 1980; Dibblee, 1989a, 1989b, 1991a, 1991b, 2002; Rubin, 1992; Yerkes, 1997; Yerkes and Graham, 1997; Dyer, 1988.



Project Number: 2103

**Geologic Map**  
**Glendale, California**

**Plate**  
**2-1**

The preceding geologic map was compiled by the following:

15

Byer, J.W., 1968, Geologic map of a part of the San Rafael Hills: Unpublished map prepared for the City of Glendale (*according to Weber et al. 1981*).

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1989, Geologic map of the Los Angeles quadrangle, Los Angeles County, California: Dibblee Geological Foundation Map DF-22, scale 1:24,000.

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1989, Geologic map of the Pasadena quadrangle, Los Angeles County, California: Dibblee Geological Foundation Map DF-23, scale 1:24,000.

Dibblee, T.W., and Ehrenspeck, H.E., ed., 1991, Geologic map of the Sunland and Burbank (north 1/2) quadrangles, Los Angeles County, California: Dibblee Geological Foundation Map DF-32, scale 1:24,000.

Weber, F.H., Jr., Bennett, J.H., Chapman, R.H., Chase, G.W., and Saul, R.B., 1981, Earthquake hazards associated with the Verdugo Eagle Rock and Benedict Canyon fault zones, Los Angeles County, California, U.S. Geological Survey, Open-file report No. 81-296, 173 p.

Yerkes, R.F., 1997, Preliminary geologic map of the Los Angeles 7.5-minute quadrangle, southern California, Open-file Report 97-254.

Yerkes, R.F., 1997, Preliminary geologic map of the Burbank 7.5-minute quadrangle, southern California, Open-file Report 97-166.

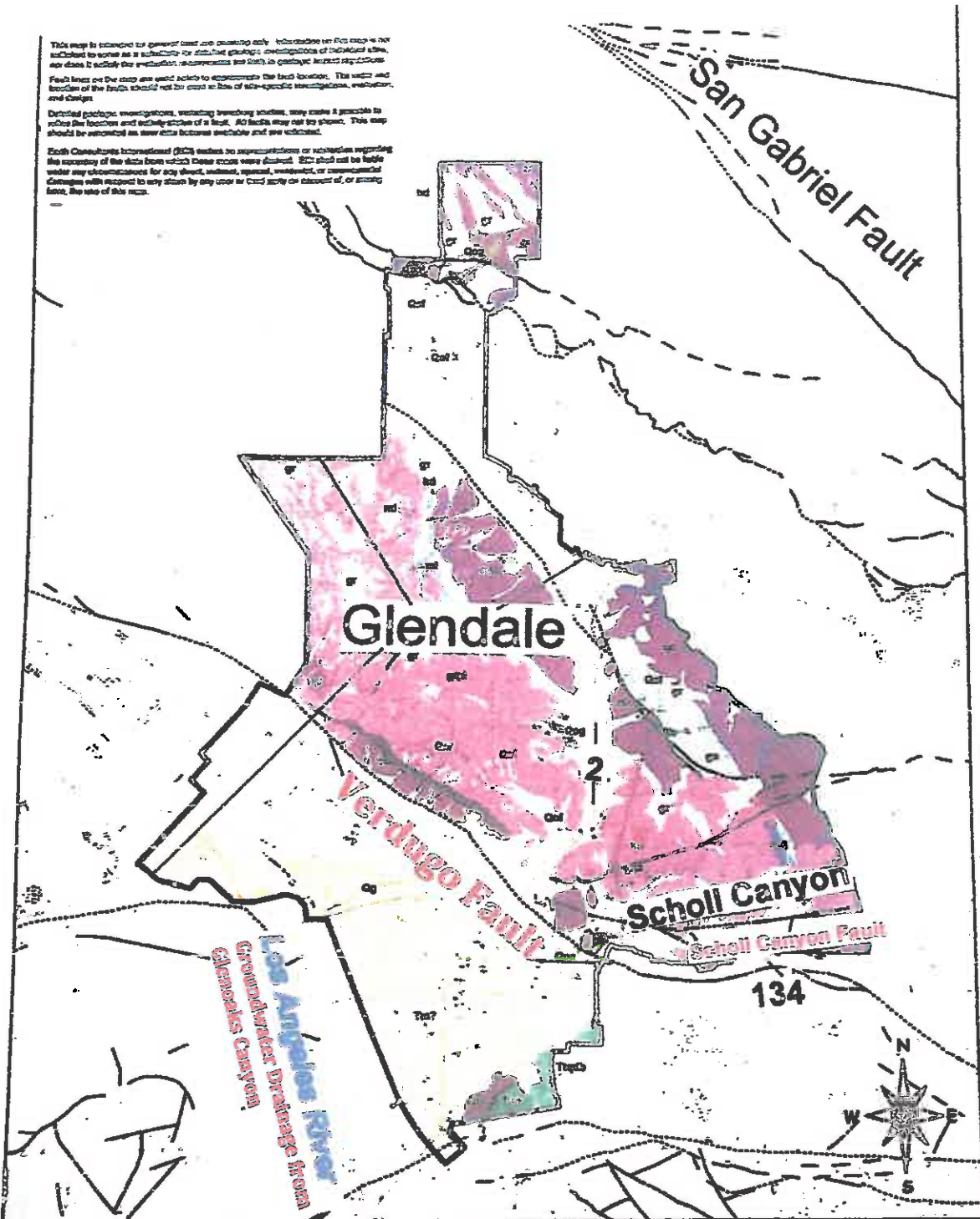
Yerkes, R.F., 1997, Preliminary geologic map of the Hollywood 7.5-minute quadrangle, southern California, Open-file Report 97-255.

This map is intended for general use and is primarily for informational purposes. It is not intended to serve as a substitute for detailed geologic investigations of individual sites, nor does it satisfy the evaluation requirements for data in geologic hazard investigations.

Each line on the map is used solely to approximate the fault location. The width and location of the fault should not be used as data in site-specific investigations, evaluation, and design.

Detailed geologic investigations, including trenching studies, may make it possible to refine the location and characteristics of a fault. All faults may not be shown. This map should be interpreted as more data becomes available and are collected.

Each Consortium International (CCI) section is representative of information regarding the geology of the area from which these areas were derived. CCI should not be held under any circumstances for any direct, indirect, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of this map.



Scale: 1:60,000



Base Map: USGS Topographic Map from SureMAPS RASTER  
Sources: Weber, 1980; Dibble, 1989a, 1989b, 1991a, 1991b, 2002; Rubin, 1982; Yerkes, 1987; Yerkes and Graham, 1987; Byer, 1988.



**Geologic Map**  
**Glendale, California**

Plate  
2-1

# GEOLOGIC UNIT DESCRIPTIONS

## Surficial Sediments

Qaf	Artificial fill
Qg	Stream channel deposits of gravel, sand and silt.
Qa	Alluvium; unconsolidated floodplain deposits of silt, sand and gravel.
Qf	Alluvial Fan
Qls	Mapped Landslide

Quaternary

## Older Dissected Surficial Sediments

Qos	Remnants of older weakly consolidated alluvial deposits of gravel, sand and silt.
Qof	Alluvial fan gravel and sand derived from San Gabriel Mountains; includes some Qg and Qa in northern areas.
Qog	Elevated remnants of alluvial gravel and fanglomerate deposits, weakly indurated; in San Gabriel Mountain foothills partly weathered reddish; in that area may locally include Pacoima and Saugus Formation of Smith (1986).

Pleistocene

## Monterey Formation

Tm?	White-weathering, thin bedded, platy siliceous and semi siliceous rocks.
-----	--

## Topanga(?) Formation

Ttqcb	Gray to brown breccia, massive to vaguely bedded, composed of angular detritus and a few rounded cobbles and boulders, all of biotite hornblende quartz diorite.
Ttr	Light gray to brown, semi-friable sandstone, and interbedded brown sandy to silty shale, semisiliceous shale, and pebble-cobble conglomerate of quartz diorite detritus; Luisian(?) stage.

Miocene

## Dike Rocks

Tb	Thin dikes of black to brown, fine-grained basaltic to andesitic intrusive rocks.
Ti	Thin dikes of light gray latite porphyry.

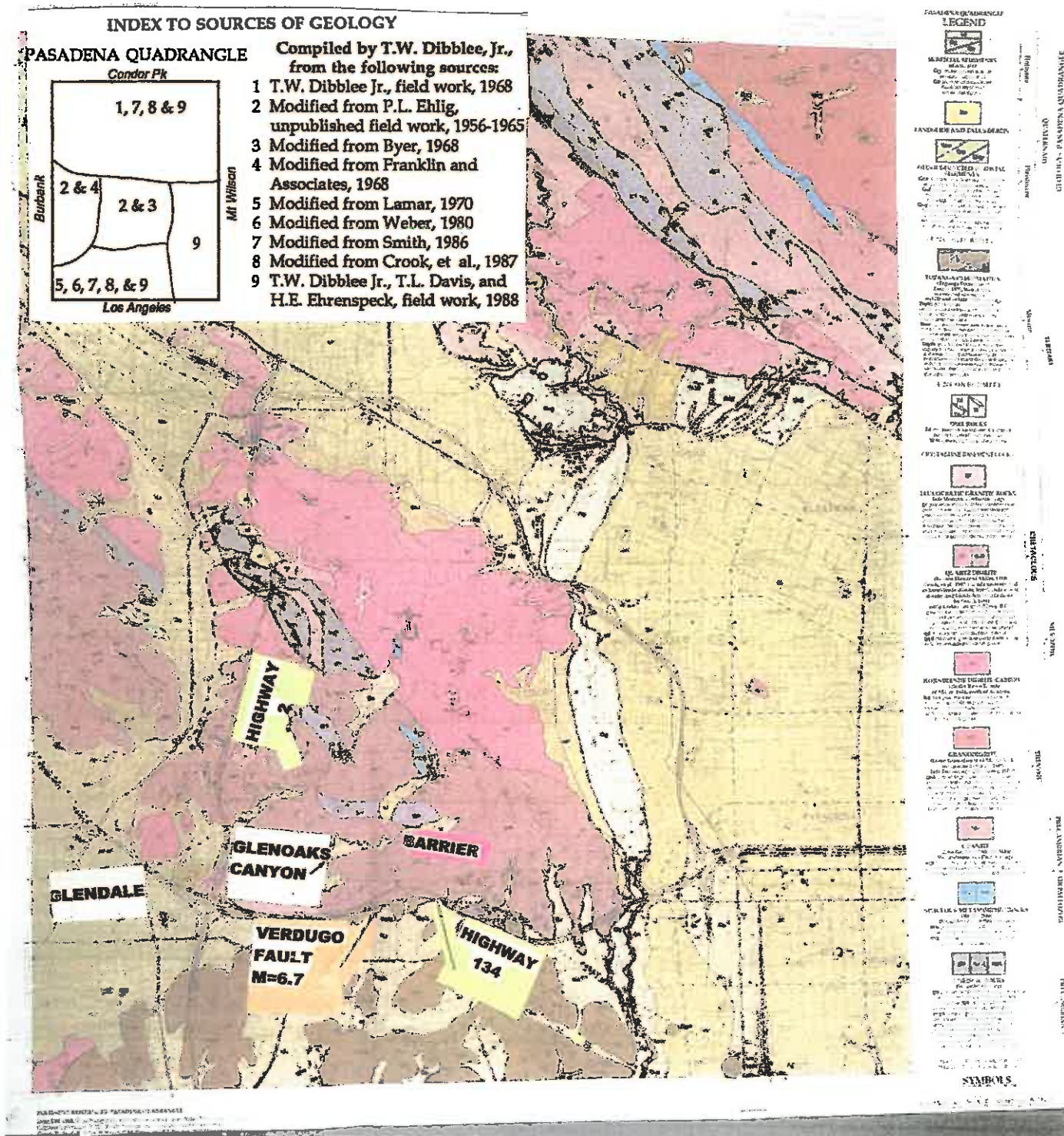
Tertiary

~11 TO ~23 MILLION YEARS ~1 TO ~2 MILLION YEARS ~<1 MILLION YEARS



Precambrian (?)	OLDER THAN	~590 MILLION YEARS	YEARS	Mesozoic
Paleozoic or Older		~250 TO ~590		
		90 MILLION YEARS		





**GEOLOGIC MAP OF THE PASADENA QUADRANGLE, LOS ANGELES COUNTY**  
By Thomas W. Dibblee, Jr., 1989. Dibblee Foundation Map #DF-23, First Printing May 1989

## VERDUGO FAULT

### LOSS ESTIMATION FOR CALIFORNIA EARTHQUAKES

Using HAZUS loss estimation software (HAZUS is a nationally applicable standardized methodology that contains models for estimating potential losses from earthquakes, floods, and hurricanes), created by the Federal Emergency Management Agency (FEMA), the California Geological Survey, and the United States Geological Survey, developed economic losses for the ten most damaging "scenario earthquakes" (R. Chen, D. Branum, and C.J. Willis, California Geological Survey, 2009) (see chart below).

#### Five Most Damaging Scenarios Earthquakes in Northern and Southern California and Associated Economic Losses

	Scenario Earthquakes	M = Mag- nitude	Economic Losses (\$M) (M=millions)		
			Buildings Related (\$M)	Transportation System (\$M)	Utility System (\$M)
Northern California (Initials = Individual Faults)					
N1	Northern San Andreas Fault (SAS+SAP+SAN+SAO) <sup>1</sup>	7.90	79,834	1,436	2,583
N2	Northern San Andreas Fault (SAS+SAP+SAN) <sup>1</sup>	7.76	70,628	1,172	2,026
N3	Northern San Andreas Fault (SAP+SAN+SAO) <sup>1</sup>	7.83	66,216	1,162	1,856
N15	Hayward-Rodgers Creek Fault (HS+HN+RC) <sup>1</sup>	7.26	36,883	826	1,695
N4	Northern San Andreas Fault (SAF SAS+SAP) <sup>1</sup>	7.42	34,299	721	1,212
Southern California					
S8	Puente Hills Fault	7.1	79,662	1178	1,966
S17	Newport – Inglewood Fault	6.9	34,319	482	958
S1	Verdugo Fault	6.7	23,751	270	826
S2	San Andreas Fault – Southern	7.8	20,515	503	1,489
S18	Palos Verdes Fault	7.1	20,084	367	796

#### California Geological Survey Regional Geologic Hazards and Mapping Program LOSS

California Geological Survey - 2009 Earthquake Loss Estimation

HAZUS Loss Estimation for California Scenario Earthquakes

Rui Chen, David Branum, and Chris J. Willis

California Geological Survey

June 2009

The estimated magnitude earthquake, in this report, for the Verdugo fault is M 6.7. The monetary loss (in the above chart) for buildings is estimated to be \$23,751,000. This is the fifth most damaging scenario earthquake in southern California.

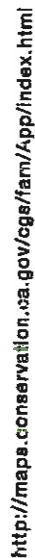
**Stantec (2017, 3.6.7, page 148)** concludes that "potential impacts related to rupture of a known earthquake fault (referring to the Verdugo fault) or strong seismic ground shaking are considered less than significant".

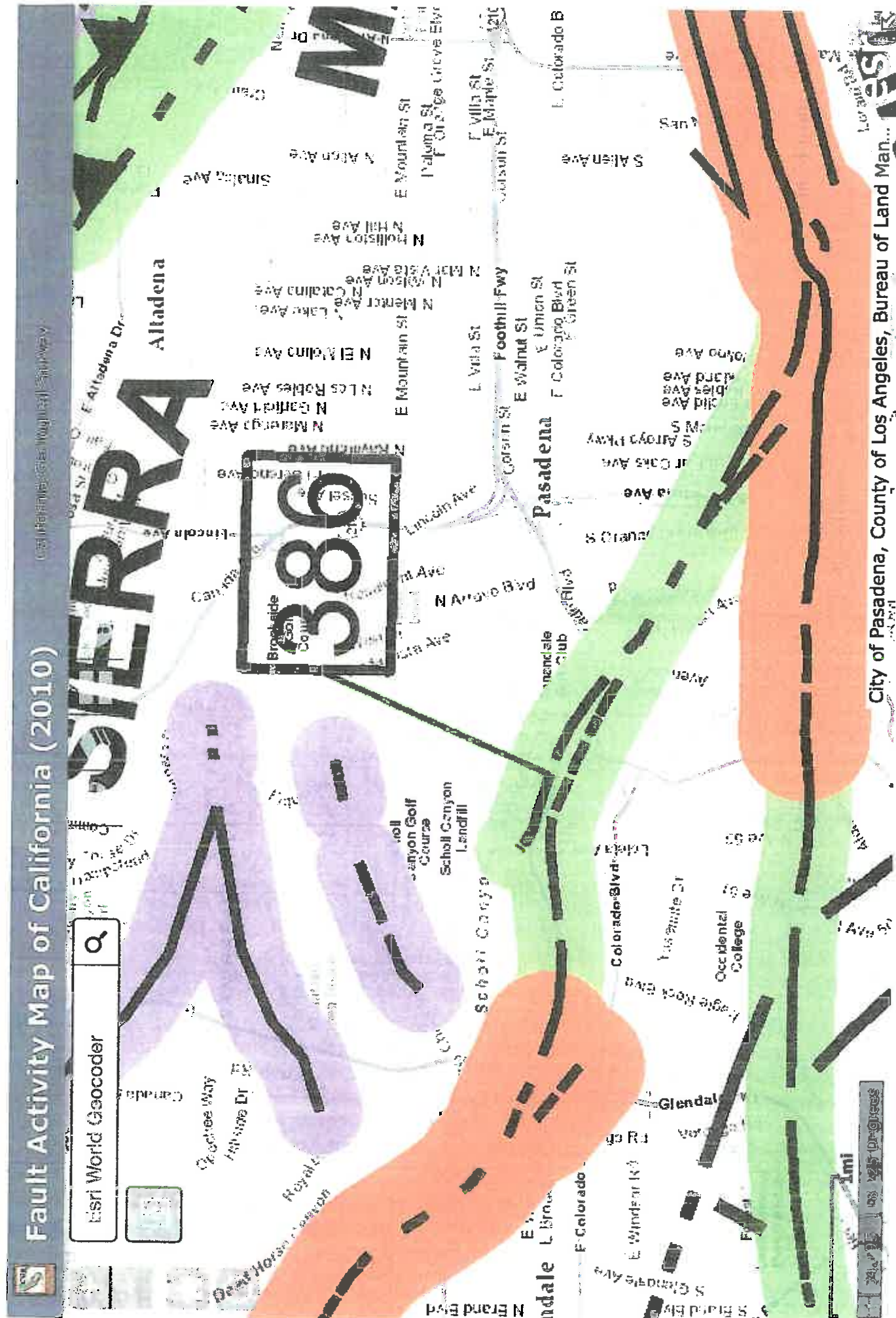
However, the Fault Activity Map of California (2010) (**Pages 22, 23**), California Geological Survey (see maps below) indicates that fault activity along a strand of the Verdugo fault (**orange**), M 6.7, ~ 0.5 mi west of the landfill, occurred during the Holocene Epoch, i.e., between 11,700 and 200 years before Present.

Damage from the 1994, M 6.7, Northridge earthquake occurred up to **85 miles (125 km)** away from its epicenter, with the most damage in the west San Fernando Valley, and the cities of **Santa Monica, Simi Valley** and **Santa Clarita**.

A strand of the Verdugo fault (**green**), depicted on the fault activity map, < 0.5 mi. south of the landfill, is estimated to have been active between 700,000 years (Pleistocene Epoch) and the Holocene Epoch (i.e., between 11,700 and 200 years).









## CONCLUSIONS

The Glendale City Counsel should consider both the beneficial monetary aspects for the City of Glendale that might result from the proposed expansion of the Scholl Canyon Landfill (**Stantec 2017**), and the environmental safety of the citizens of Glendale and beyond.

Based on my analysis, the present landfill, the proposed expansion of the Scholl Canyon Landfill, and the geologic hazards within and near the landfill represent both present and future environmental threats to the health and safety of citizens living in the region.

There are hazardous substances present both down-regional drainage from the concrete and volcanic ash (bentonite) subsurface barrier and to the east of the barrier near the western boundary of the landfill. These substances are documented in quarterly and annual monitoring reports for the Scholl Canyon Landfill by the California County Sanitations Districts of Los Angeles County. There are more than 200 substances of concern (**Page 7**) associated with the Scholl Canyon Landfill. One of those substances is trichloroethene. Statistical analyses show an increasing trend for Trichloroethene. Trichloroethene has been detected in monitoring wells since at least 1991.

The absence of a composite liner or impermeable membrane at the base of the landfill, and above a highly fractured rock basement, allows substances of concern to percolate down the regional drainage into the groundwater.

The presence of the Scholl Canyon fault zone, depicted on **pages 14 and 16**, can also act as a conduit for contaminated groundwater to migrate westward in the subsurface.

**Stantec 2017 Section 3.6.3**, referring to the Scholl Canyon fault or faults, notes that "recent (sic) mapping by Dibblee (1989) does not even show these faults, and there is (sic) no data available to indicate that these fault traces, if even present, are active" (*underline emphasis mine*).

**My Comments:** The Scholl Canyon faults were mapped by Byer, J.W., 1968, Geologic map of a part of the San Rafael Hills. This is an "Unpublished map prepared for the City of Glendale," as per Weber et al. 1981, i.e., Weber, F.H., Jr., Bennett, J.H., Chapman, R.H., Chase, G.W., and Saul, R.B., 1981, Earthquake hazards associated with the Verdugo Eagle Rock and Benedict Canyon fault zones, Los Angeles County, California, U.S. Geological Survey, Open-file report No. 81-296, 173 p.].

The landfill opened in 1961. The northern or northeastern part of the landfill was inactive (filled) by 1975. Filling of the southern part began in 1975. J.W. Byer would have had access to Scholl Canyon (upper Glenoaks Canyon) in 1968 in order to map the geology in the canyon. The canyon would have been cleared and prepared, or was in part being prepared, for accepting trash just before the geologic mapping of Byer (1968). **None** of the contributors to the Geologic map of the Pasadena quadrangle (**Page 19**), including Tom Dibblee, is known to mapped in the southern part of the Pasadena quadrangle, or in Scholl Canyon/upper Glenoaks Canyon during the 1960s.



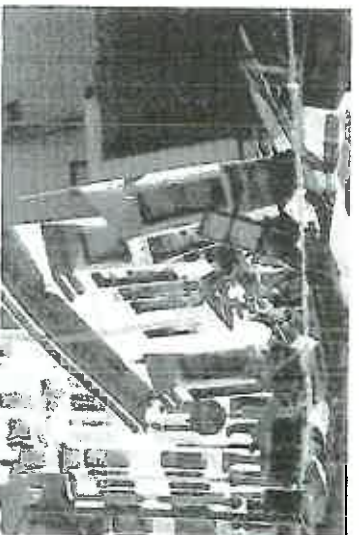
I will leave it to the reader as to why a contributor to the **Stantec 2017** report would seemingly denigrate or minimize the geologic mapping of J.W. Byer done in 1968. [Note: J.W. Byer (1975) was the editor of Sycamore Canyon fault, Verdugo fault..., Guidebook for the Southern California Section of the Association of Engineering Geologists Annual Field Trip, September 27, 1975, 68 p.]

**Stantec 2017** concludes that ground shaking during seismic activity of 6.7M along the Verdugo fault would be less than significant.

**My comments:** The California Geological Survey (CGS), in contrast to seismic activity being "less than significant", concludes that the Verdugo fault is one of the five most damaging scenario earthquake faults in Southern California. The estimated monetary loss for destroyed and damaged buildings during seismic activity associated with the Verdugo fault is estimated to be \$23,751,000.

An earthquake with a magnitude of M6.7, as assigned by the CGS and the U.S. Geological Survey (a magnitude of 6.9 is assigned in Stantec 2017) to the Verdugo fault is considered a "moderate earthquake" (Richter, C.F., 1935, Bulletin of the Seismological Society of America, v. 25, no. 1-2, p. 1-32. Damage associated with a 6.7 magnitude earthquake would damage "a moderate number of well-built structures in populated areas" (and engineered structures at the landfill). "Earthquake-resistant structures would survive with slight to moderate damage". "Poorly designed structures would receive moderate to severe damage". "A M6.7 earthquake is felt in wide areas, i.e., up to hundreds of miles/kilometers from the epicenter". "There is strong to violent shaking in the epicentral area". A magnitude 6.7 earthquake could rupture the barrier in the Scholl Canyon landfill, damage engineered structures, electric power facilities, and equipment, based on damage caused by the M6.7 1994 Northridge earthquake.

**With the health and safety of Glendale's men, women, and children at stake, this is the time for great caution when considering further developing the Scholl Canyon landfill.**



Earthquake damage, Northridge Earthquake, 1994, M6.7

**From:** [Suzanne Smith](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [Councilmember José Huizar - Northeast LA](#); [board@ernc.la](mailto:board@ernc.la)  
**Subject:** Scholl Canyon Dump  
**Date:** Thursday, October 19, 2017 7:48:17 PM

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46

Dear Mr. Joe,

I am writing to ask you to put a halt to consideration of this issue until the City of Glendale reaches out to the residents of Eagle Rock, who are directly affected by the dump.

This will affect us far more than most people in Glendale. However, it appears that there has been no EIR done to determine how the biogas project will affect our community. It is outrageous that you attempted to sneak this by our local council office, The Eagle Rock Association, and the Eagle Rock Neighborhood Council, all of whom raised significant concerns about your plans for expansion of the dump several years ago.

I am therefore asking that you

- 1) HALT consideration of the biogas issue until further notice;
- 2) Work with the above mentioned groups to hold a Q&A for Eagle Rock residents and others; and
- 3) Commit to an EIR for the LA areas that currently adjoin the dump.

I look forward to hearing your response.

Suzanne Smith  
Eagle Rock resident and Faith Based Groups  
Director for the Eagle Rock Neighborhood Council

Sent from [BlueMail](#)

46-1

46-2

46-3

46-4

46-5

From: [Celine](#)  
To: [Joe, Dennis](#)  
Subject: Power plant shutdown  
Date: Thursday, October 19, 2017 7:59:22 AM

47

## Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower [Scholl Canyon Park](#) where children play, there are several homes within meters, and children’s baseball fields are located.

### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
William Malone

47-1

47-2

47-3

47-4

47-5

47-6

47-7

**From:** [Audrey Mandelbaum](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [David Moore](#)  
**Subject:** Eagle Rock resident concern about Scholl biogas project  
**Date:** Friday, October 20, 2017 12:46:07 PM

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Dear Mr. Joe, I am an Eagle Rock resident. I have strong concern about the process for considering community feedback on the biogas project. I am raising a family in this community and need more information about the noise and traffic impact and the safety of the project and the pipeline. I look forward to getting info about a hearing in Eagle Rock with you to discuss the impact o the project on this community.

48-1

48-2

48-3

48-4

Thank you for your time.

Audrey Mandelbaum  
323.376.5690

--

Audrey Mandelbaum, MFA  
Administrative Director  
Undergraduate Studies  
Antioch University Los Angeles  
400 Corporate Pointe  
Culver City, CA 90230  
310.578.1080 ext. 210  
[www.antiochla.edu](http://www.antiochla.edu)  
[Undergraduate Studies Program Resources Page](#) (AKA our Google site)  
[Faculty Resources Page](#)



**Krause, Erik**

**From:** Burt Culver <ballast@gmail.com>  
**Sent:** Friday, October 20, 2017 11:52 PM  
**To:** Krause, Erik; Joe, Dennis  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Public Comments for Grayson EIR and Biogas project

Public comments on Biogas Renewable Project and Grayson Expansion/Repowering

I am concerned about the Biogas Renewable Project and the Grayson Expansion project. The biogas is currently being burned at Grayson. GWP wants to rebuild and expand Grayson and stop burning the biogas at that site. This will leave the biogas stranded and require that something happen to it, yet none of those consequences are considered in the Grayson Expansion Draft EIR. The biogas has to be accounted for in the Grayson EIR because burning it elsewhere is a consequence of the project. I think that these projects are therefore closely related and should be considered as one project.

49-1

Additionally, Grayson wants to add 43MW of new power at Grayson. Then they want to add 12MW of new power at Scholl Canyon yet if they looked at both of them together then they would have to get state review as projects over 50MW require state review. Separating these project seems like a way to get around the 50MW state oversight threshold.

49-2

Similarly, for the Grayson Repowering/expansion they did not look at locating the biogas generators at Grayson along side the new generators there because it would throw the project over the 50MW threshold and require state approval. They do discuss avoiding paying the air resource boards emission fees because they could relocate the burning of the biogas to the landfill and take advantage of the permitting loophole for new generation at landfills.

49-3

49-4

Since they are taking away the biogas from Grayson to burn it elsewhere, when calculating the new generation power at Grayson, they should subtract the megawatt contribution of the biogas before arriving at the amount of new generating capacity.

49-5

Both of these projects are in the same air basin and are being done by the same entity at the same time so cumulative effects of these new and expanded power stations should be examined.

49-6

In the Grayson Repowering EIR they include the emissions of the generators that are burning the biogas. These generators create more pollution when they are burning biogas. In the Grayson EIR they calculate the new emission differential by subtracting the emissions profile of the generators burning biogas from the emissions profile of the new generators. But if they are planning on relocating the biogas burning to Scholl canyon then they should find the real emission differential for Grayson by comparing it to when the old generators are not burning biogas. This would be a more accurate look at the real increase in pollution of the new plant.

49-7

Regards,

Burt Culver  
 Glendale



**From:** [dianna jaynes](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Need Environmental Impact Report  
**Date:** Friday, October 20, 2017 1:13:52 PM

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50

Hello,

My name is Dianna Jaynes and I am an Eagle Rock resident and homeowner.

I am writing to ask you to put a halt to consideration of this issue until the City of Glendale reaches out to the residents of Eagle Rock, who are directly affected by the dump. This will affect us far more than most people in Glendale. However, it appears that there has been no EIR done to determine how the biogas project will affect our community. It is outrageous that you attempted to sneak this by our local council office, The Eagle Rock Association, and the Eagle Rock Neighborhood Council, all of whom raised significant concerns about your plans for expansion of the dump several years ago. I am therefore asking that you 1) HALT consideration of the biogas issue until further notice; 2) Work with the above mentioned groups to hold a Q&A for Eagle Rock residents and others; and 3) Commit to an EIR for the LA areas that currently adjoin the dump. I look forward to hearing your response.

Sincerely,  
Dianna Jaynes

50-1  
50-2  
50-3  
50-4  
50-5

**From:** [Erik Blank](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon Biogas Project  
**Date:** Friday, October 20, 2017 9:25:39 AM

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51

Greetings Mr. Joe,

I'm writing to you to request a public presentation of the Scholl Canyon Biogas project to the residents of Eagle Rock. As you know this landfill and proposed project overlooks a good portion of Eagle Rock and we deserve to learn more about this project which is literally in our back yard. I'd also like to point out that in your mitigated EIR that you don't mention Dahlia Heights Elementary which as the crow flies is probably closer than the school on Figueroa, maybe even less than a mile away. Please provide us a chance to hear about your project and voice our concerns in a public setting.

● 51-1  
● 51-2  
● 51-3  
●

Thank you,

Erik Blank  
5212 Loleta Avenue  
Los Angeles, CA 90041

Dear Mr. Krause,

I am a parent of a student at Benjamin Franklin Magnet Elementary in Glendale, and a resident of Eagle Rock.

I write to ask the Mayor and City Council to put the Grayson and Scholl Canyon projects on hold while an independent study is commissioned to assess clean energy alternatives and the environmental impact of the proposals.

Expanding Grayson will increase the pollution in the already-polluted air my daughter breathes at her school (which is near the 134 and 5 freeways). Even before the proposed plant is operational, the contaminants on the site may be released into the air during construction and travel to nearby school and neighborhoods, including Ben Franklin. I along with other Ben Franklin parents are already concerned about the health impacts the current level of air pollution has on our children - we need to improve the air our children breathe every day, not make it worse.

The School Canyon proposal may have the same detrimental impact on the air my daughter and family breathe at home in our neighborhood of Eagle Rock.

Please do the responsible thing for the City of Glendale, its students, and neighbors - commission a study to understand the impact of the proposals and explore cleaner, healthier alternatives.

Thank you,

Jennifer Hoffman  
cell: [323-573-3667](tel:323-573-3667)

52-1

52-2

52-3

52-4

**From:** [Joel Aldape](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Public comment: proposed biogas generation project at Scholl Canyon  
**Date:** Friday, October 20, 2017 9:55:16 AM

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53

Dear Mr. Dennis Joe,

I am a resident of Eagle Rock and I'm very concerned about the city of Glendale's proposed biogas generation project at Scholl Canyon. Eagle Rock residents currently bear all the negative effects of Scholl Canyon because it's located above Eagle Rock. Any expansions at Scholl Canyon, including new activities such as biogas generation, affect residents in Eagle Rock. As a city official and steward of public funds, I believe you have an obligation to ensure Eagle Rock residents have the necessary time and channels to provide comments on emissions and pollution emanating from the proposed biogas project. I understand that Eagle Rock residents have not been given a public meeting for this purpose.

Please consider my comments in ensuring that the city of Glendale provides Eagle Rock residents appropriate time and channels to provide input on this proposed project.

Sincerely,  
Joel Aldape  
2523 Langdale Ave  
Eagle Rock, CA 90041

53-1

53-2

53-3

53-4

**From:** [Joel Arquillos](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [Zenay Loera](#); [Nate Hayward](#); [Paul.Habib@lacity.org](mailto:Paul.Habib@lacity.org)  
**Subject:** Blogas project  
**Date:** Friday, October 20, 2017 9:29:30 AM

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54

Dennis,

I'm writing to ask that you give the residents of Eagle Rock a special presentation on your proposal. We need more information and time to digest. All I've read so far makes the plan seem like a good thing, but there's no way any processing of garbage has no harmful side effects to the air and the people of this community.

Could you please speak to the Eagle Rock Neighborhood Council about this? Set up a meeting?

Thanks,  
Joel

--

**Joel Arquillos**  
Executive Director

[5HalfMarathon\\_E-Signature-01.png](#)



[Twitter](#) - [Facebook](#) - [Instagram](#)

**826LA in Echo Park:** [213-413-3388](tel:213-413-3388)  
**826LA in Mar Vista:** [310-915-0200](tel:310-915-0200)

826LA is a non-profit organization dedicated to supporting students ages 6 to 18 with their creative and expository writing skills, and to helping teachers inspire their students to write.

● 54-1  
●  
● 54-2  
●

**From:** [john crooke](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Need Environmental Impact Report  
**Date:** Friday, October 20, 2017 2:02:24 PM

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55

Hello,

My name is John Crooke and I am an Eagle Rock resident and homeowner.

I am writing to ask you to put a halt to consideration of this issue until the City of Glendale reaches out to the residents of Eagle Rock, who are directly affected by the dump. This will affect us far more than most people in Glendale. However, it appears that there has been no EIR done to determine how the biogas project will affect our community. It is outrageous that you attempted to sneak this by our local council office, The Eagle Rock Association, and the Eagle Rock Neighborhood Council, all of whom raised significant concerns about your plans for expansion of the dump several years ago. I am therefore asking that you 1) HALT consideration of the biogas issue until further notice; 2) Work with the above mentioned groups to hold a Q&A for Eagle Rock residents and others; and 3) Commit to an EIR for the LA areas that currently adjoin the dump. I look forward to hearing your response.

55-1

55-2

55-3

55-4

55-5

Sincerely,  
John Crooke

--

John Crooke

323.229.0287 | [johncrooke@gmail.com](mailto:johncrooke@gmail.com)



**From:** [John Dunlop](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Public Comment on Scholl Canyon Biogas Generation Project  
**Date:** Friday, October 20, 2017 8:17:12 PM

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56

**Hello Mr. Joe**

**I am a resident of Eagle Rock, Glendale's neighboring community in the City of Los Angeles. As an Eagle Rock resident, I have questions about the Scholl Canyon biogas generation project. What are the adverse impacts will it have on air quality in Eagle Rock? What about traffic and noise pollution? What about the safety of Eagle Rock residents with a Biogas Plant and aging pipes?**

56-1

56-2

56-3

**I find it unacceptable that Glendale's Mitigated Negative Declaration did not include any outreach to Eagle Rock. And the public comment period was far too short, despite the extension to today, October 20, 2017.**

56-4

56-5

**Los Angeles City Councilman Jose Huizar's office, TERA and the ERNC have requested a hearing here in our community to focus on the issues that concern Eagle Rock. To date, Glendale has declined to further extend today's comment deadline or to hold a local hearing.**

56-6

**Therefore, I join the aforementioned  
representatives of Eagle Rock in requesting that  
Glendale hold a local hearing to fully consider  
your neighboring community's concerns, or, at the  
very least, extend today's comment deadline.**

56-7

**Regards,  
John Dunlop  
Eagle Rock Resident**

**From:** [Justin King](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Comments to Biogas Renewable Generation Project  
**Date:** Friday, October 20, 2017 2:05:16 PM

57

I believe that the Mitigated Negative Declaration (MND) for the Biogas Renewable Generation Project underestimates the projects potential negative impacts to the environment and surrounding community. As a member of the Scholl Canyon community I request that a full Environmental Impact Study (EIR) for this project be conducted. Additionally, I request that the EIR take into account the two other projects that are being proposed at the Scholl Canyon Landfill (Landfill Expansion and development of an anaerobic digestion project). I believe that the City of Glendale needs to be more transparent to their community members and tax payers regarding planned activities at the landfill. Additional questions regarding the MND are listed below:

1. Would the 3,500 foot natural gas line be double walled? How will it be secured above ground? What type of alarms would be installed to notify of a leak? 57-1
2. Is a real time telemetry alarm system being utilized for the project? 57-2
3. How will the aqueous ammonia be stored? What type of secondary containment will be used to prevent spill of aqueous ammonia to the environment? 57-3
4. What chemical is the carbon monoxide catalyst? Is it a hazardous chemical? Where will it be stored on-site? 57-4
5. What volume of impurities from condensate is estimated to be stored on-site at one time? Where will the impurities be stored? Is there secondary containment associated with the storage tank? 57-5
6. Where will hazardous waste be stored on-site? 57-6
7. Is AQMD reviewing the air modeling? 57-7
8. There is a Glendale Municipal water well located within Glenoaks Canyon downgradient of the existing landfill. Have potential impacts to the existing groundwater well (MWD G02) been assessed? 57-8
9. The air modeling uses only two stations located within the basin four and six miles from the landfill. I don't believe that the two stations being used are representative of the conditions at the landfill. More air monitoring at the landfill is needed in order to determine potential affects of the project. 57-9

I look forward to your responses.

Thank you,

Justin King

Resident of Glenoaks Canyon

**From:** [Kenny Sylvain](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Re: Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Friday, October 20, 2017 9:18:58 AM

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58

Mr. Dennis Joe, Case Planner  
  
Community Development Department  
  
Planning Division Office  
  
Glendale Water and Power  
  
141 N. Glendale Avenue  
  
Glendale, CA 91206  
  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000-gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry

58-1  
58-2  
58-3  
58-4

grasses, and brush blanketing the hills.

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

### **Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

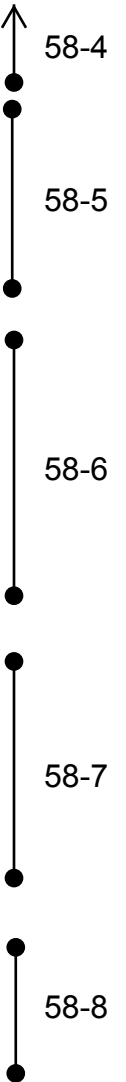
### **Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

I am a homeowner in the Glenoaks Canyon community with a young family, and I am deeply concerned about the future prospects of these projects that pose a health and safety risk to our local community.

Best regards,

**Kenny Sylvain**



**From:** [Kevin Tseng](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Bio-Gas Generator / Scholls Canyon  
**Date:** Friday, October 20, 2017 7:57:30 PM

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59

Hi there. It's my understanding that there has been no official or well-publicized meeting set up to get public feedback about this generator project...? If that is the case, I think that is incredibly irresponsible and should be rectified. Please include the public in such large decisions. Schedule an open meeting/forum now for this project!  
Kevin in 90041

59-1



**From:** [Lisa Karahalios](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon Pollution  
**Date:** Friday, October 20, 2017 12:58:03 PM

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60

Dear Mr. Joe:

This letter is to inform you that I will be joining the fight to stop the Biogas Project at the Scholl Canyon Dump.

Glendale already has a way of using that gas. When you build your new power plant in Glendale, continue to burn the Scholl Canyon gas that goes through the existing pipeline.

Eagle Rock residents are getting tired of bearing the brunt of traffic and pollution created by the dump.

Lisa Karahalios  
1161 Kipling Ave.  
Eagle Rock, CA

60-1  
60-2  
60-3

**From:** [Marites](#)  
**To:** [Joe. Dennis](#)  
**Subject:** SCHOLL CANYON BIOGAS GENERATION PROJECT  
**Date:** Friday, October 20, 2017 2:04:32 PM

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61

Our family, friends and neighbors are 100% against the landfill construction and operation of a 12-megawatt power generation facility at 7721 N. Figueroa St. at the Scholl Canyon Landfill, which too close to our homes - the Eagle Rock neighborhood in the city of Los Angeles.

61-1

Thank you,  
Marites Ruano, Krys Howard, Yric Howard, Andrew Howard and Nikole Howard.

**From:** [Marti Doughty](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Concerns to proposed biogas plant  
**Date:** Friday, October 20, 2017 7:01:27 PM

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62

As a EAGLEROCK citizen that lives adjacent to landfill . My house/property is right below SCHOLL Canyon pass the 134 freeway. I have large concerns regarding the new Glendale proposal for biogas plant. I disagree and have concerns in having this built near my home. Concerns with freeway pollution and now this new biogas plant . Increase in health problems? Will be contacting our district representative

62-1

62-2

Sent from my iPhone

**From:** [Kurdoghlian, Kevork](#)  
**To:** [Joe, Dennis](#); [Lorenz, Tom](#)  
**Cc:** [Haroutunian, Atineh](#)  
**Subject:** FW: Glendale Biogas project - questions from Boulevard Sentinel  
**Date:** Friday, October 20, 2017 4:45:12 PM  
**Attachments:** [Questions to Glendale on Scholl Canyon.docx](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

63

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Dear Dennis and Tom,

Please see attached questions from Mary Lynch, a reporter with the Boulevard Sentinel. Her questions are regarding Scholl Canyon Landfill. Thank you!

Best,

**Kevork Kurdoghlian | City of Glendale | Management Services**

613 East Broadway, Suite 200 | Glendale, CA 91206 | (818) 548-4844 | [kkurdoghlian@glendaleca.gov](mailto:kkurdoghlian@glendaleca.gov)



**From:** mary lynch [mailto:lynchmm123@gmail.com]  
**Sent:** Friday, October 20, 2017 4:25 PM  
**To:** Haroutunian, Atineh; Kurdoghlian, Kevork  
**Subject:** Glendale Biogas project - questions from Boulevard Sentinel

Good afternoon! Thanks to both of you for speaking to me this afternoon.

Mr. Kurdoghlian, just after I spoke with you suggesting that it might be best if I send questions to you to transmit to Mr. Joe, Ms Haroutunian, from his office, called me to suggest the same thing.

So, here they are. If Mr. Joe prefers to just send me responses, that is great, or he can give me a call. I am on a deadline - we go to print next Wednesday and I need to get the story into the editor, so if there is any way you can provide me with responses by tomorrow, that would be very helpful.

Many thanks  
Mary Lynch  
916 606 0783

Questions about the project and the MND review process:

- |  |       |
|--|-------|
| 1. When does Glendale expect the construction of the biogas facility to begin?   | 63-1  |
| 2. When is the Scholl Canyon landfill expected to cease operations (ie., be full)?   | 63-2  |
| 3. What is the current average daily tonnage per day (TPD) put into the Scholl Canyon landfill?  | 63-3  |
| 4. Does the biogas plant in any way serve to extend the life of the Scholl Canyon landfill?  | 63-4  |
| 5. Does the pipeline that currently takes gas from Scholl Canyon to Grayson go through any part of Eagle Rock or any town outside of Glendale?   | 63-5  |
| 6. Section 1.1 of the MND says no new transmission is needed to move the power that will be generated by the Biogas facility to the power grid. But currently, the gas from landfill is transported via pipeline to the Grayson facility, so there is no current power production at Scholl Canyon, is there? If that is correct, won't some new transmission be needed on the site? | 63-6  |
| 7. Table 1.5-1 of the MND says that Glendale is the lead agency for processing and adopting the IS/MND. Is it customary for the same agency to have both roles of preparing and adopting the report?   | 63-7  |
| 8. Section 2.1 of the MND says that an expansion of the landfill has been proposed but not yet approved. What is the status of the approval process?   | 63-8  |
| 9. Section 2.1 of the MND says that biogas production will continue beyond the time when Scholl Canyon closes to landfill operations. For how long will the biogas production continue once Scholl Canyon is closed to landfill operations?  | 63-9  |
| 10. Section 2.4 of the MND Overview says that life of the project is 20 years – is that without any expansion of the landfill; or does it assume some expansion of it?   | 63-10 |
| 11. David Greene chair of the Eagle Rock Neighborhood Council sent a letter dated 10/11/17 asking for an extension on the comment period, noting that Glendale had provided no notifications to Eagle Rock residents about the project. Were any notifications provided to Eagle Rock residents?   | 63-11 |
| 12. If so, when?   |       |
| 13. If not, why not?   |       |
| 14. Were notifications provided to the residents of La Canada and Pasadena, both listed as abutters on page 3.1.2 of the MND?  | 63-12 |
| 15. If so, what notifications did they receive?  |       |
| 16. I understand that just today, a letter has been issued that extends the comment period to November 9. Is the meeting in Eagle Rock requested in Mr. Greene's letter going to be scheduled before those comments are due?   | 63-13 |

**From:** [Michael Frey](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon Biogas Renewable Generation Project  
**Date:** Friday, October 20, 2017 12:47:29 PM

---

64

Dear Mr. Joe,

I am a resident and homeowner in Eagle Rock, and I'm writing to express my concern regarding the Biogas Renewable Generation Project. My understanding is this project will actually be developed in the 90041 (Eagle Rock) zip code, but the city of Glendale has not made any effort to inform residents in Eagle Rock in a public forum where our concerns can be addressed. I just learned about this project a few days ago from my neighborhood council, and the public comment period ends today.

I am especially concerned about how this project will affect air quality, pollution, traffic, and noise, as well as the potential unforeseen issues that may arise from this project. I understand that there is a MND available, and I have looked at it. Expecting residents to pour through a 35 page document is not adequate and seems like an intentional decision on the part of the city of Glendale to keep us from having our concerns addressed. We are your neighbors and will be impacted by this project. We deserve a public hearing.

Why has Glendale refused to extend this comment period or hold a local hearing?

Sincerely,

C. Michael Frey  
1318 Las Flores Dr.  
Eagle Rock, CA 90041

64-1  
64-2  
64-3  
64-4  
64-5  
64-6  
64-7



**From:** [Miss Mindy](#)  
**To:** [Joe. Dennis](#)  
**Subject:** concerned Eagle Rock Citizens...  
**Date:** Friday, October 20, 2017 3:48:21 PM

---

Hello,

I'm writing regarding the proposed Biogas development near our Eagle Rock Home.  
For years and years we have dealt with having a dump in our backyard that we can't use, while Glendale  
Trash trucks drive past our parks, pollute our air with fumes and noise.  
Please consider you neighbors in this project and be respectful.

65-1

Concerned citizen,  
Mrs. M. O'Brien

**From:** [Nik Hoffman](#)  
**To:** [ekrause@glendale.ca.gov](mailto:ekrause@glendale.ca.gov)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Sinanyan, Zareh](#); [Najarian, Ara](#); [Agajanian, Vrej](#); [Joe, Dennis](#)  
**Subject:** Objection to Grayson Re-Powering and Scholl Canyon Biogas Proposals  
**Date:** Friday, October 20, 2017 4:43:41 PM

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66

Dear Mr. Krause,

I am a parent of a student at Benjamin Franklin Magnet Elementary in Glendale, and a resident of Eagle Rock.

I write to ask the Mayor and City Council to put the Grayson and Scholl Canyon projects on hold while an independent study is commissioned to assess clean energy alternatives and the environmental impact of the proposals.

Expanding Grayson will increase the pollution in the already-polluted air my daughter breathes at her school (which is near the 134 and 5 freeways). Even before the proposed plant is operational, the contaminants on the site may be released into the air during construction and travel to nearby school and neighborhoods, including Ben Franklin. I along with other Ben Franklin parents are already concerned about the health impacts the current level of air pollution has on our children - we need to improve the air our children breathe every day, not make it worse.

The School Canyon proposal may have the same detrimental impact on the air my daughter and family breathe at home in our neighborhood of Eagle Rock.

Please do the responsible thing for the City of Glendale, its students, and neighbors - commission a study to understand the impact of the proposals and explore cleaner, healthier alternatives.

Thank you,

--

Nik Hoffman  
[nikhoffman@gmail.com](mailto:nikhoffman@gmail.com)  
323.573.1071

66-1  
66-2  
66-3  
66-4

From: [P.Harris](#)  
To: [Joe. Dennis](#)  
Cc: [martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org); [P.Harris](#); [dhbrotman@gmail.com](mailto:dhbrotman@gmail.com)  
Subject: Ignoring Community hearings for Eagle Rock residents  
Date: Friday, October 20, 2017 2:34:51 PM

---

67

Dear sir:

I'm writing this letter to understand why the community of Eagle Rock was not given a chance to know what Grayson Power Plant plans on your currently pipes connected to Scholl Canyon landfill using methane ? I personally am scared being a mother and grandmother on air quality that'll be looming in our atmosphere near future ????and to echo my councilor concerns? see below :

We have many questions about the biogas project. What are the adverse impacts will it have on air quality in ER? What about traffic and noise pollution? What about the safety of Eagle Rock residents with a Biogas Plant and aging pipes? Some of Glendale's answers are here: Mitigated Negative Declaration (MND). The document is long but the Public Comment period was short and included NO Outreach to Eagle Rock. Glendale extended the comment period deadline to October 20th.

Why???? Are you trying to hide something???

Because of the action taken by Grayson power plant...insecurity sets in me personally about environmental awareness on your part... I hope Scholl Canyon would not follow suit Aliso canyon dilemmas!!! Health is wealth think of our children's future to experience clean fresh air.

Loving earth is loving Us  
Eagle Rock resident /90041

Pia Harris  
Eagle Rock /90041

Sent from my iPhone

67-1

67-2

67-3

67-4

67-5

67-6

67-7

**From:** [Priscila Kasha](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Submission of Public Comment for Scholl Canyon Biogas Renewable Generation Project MND  
**Date:** Monday, October 23, 2017 2:58:37 PM

---

## Scholl Canyon Letter

Oct. 20, 2017

Mr. Dennis Joe  
Case Planner  
Community Development Department Planning  
Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Submission of Public Comment for Biogas  
Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated  
Negative Declaration for the Biogas Renewable  
Generation Project. I am concerned about the  
following impact(s):

## Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

68-1

2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects (landfill expansion and anaerobic digester).

68-2

3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

68-3

## Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is

68-4

deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

68-4

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

68-5

## Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

68-6

## Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of

68-7



all three pending projects: the power generators,  
the anaerobic digester facility, and the landfill  
expansion.

↑  
68-7  
●

Best regards,

Priscila Kasha  
Deputy City Attorney

2418 Bywood Dr.  
Glendale CA 91206

From: [Rachel](#)  
To: [Joe, Dennis](#)  
Subject: Submission of Public Comment for Biogas Renewable Generation Project MND  
Date: Friday, October 20, 2017 5:06:00 AM

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69

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### **Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

2. The study (MND) does not factor in the emissions from the current landfill and other

proposed projects. (landfill expansion and anaerobic digester)

3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

### **Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista

have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

### **Geology**

1. There are several fault lines within close proximity to the proposed generator.

There

are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are

located.

### **Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

69-1

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69-6

69-7

Best regards,

Rachel Arruejo

**From:** [Ryan Reilly](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Biogas Renewable Generation Project  
**Date:** Friday, October 20, 2017 2:24:39 PM

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70

It's quite unfair for the city of Glendale to extend the burden of your waste facility onto residents of Eagle Rock. Please reconsider your actions and close the dump like it was supposed to be.

70-1

Thank you.

Ryan Reilly  
1610 Hill Drive  
Los Angeles, CA 90041  
323-377-3884

**From:** [Tim Campbell](#)  
**To:** [Joe. Dennis](#)  
**Subject:** NO to Scholl Canyon Biogas Renewable Generation Project!  
**Date:** Friday, October 20, 2017 2:22:12 PM

---

71

Dear Mr. Joe,

I am a resident and homeowner in Eagle Rock, and I'm writing to express my deep concern and alarms regarding the Biogas Renewable Generation Project. My understanding is this project will actually be developed in the 90041 (Eagle Rock) zip code, but the city of Glendale has not made any effort to inform residents in Eagle Rock in a public forum where our concerns can be addressed. I just learned about this project a few days ago from my neighborhood council, and the public comment period ends today.

71-1

In 2017, when renewable power sources are getting cheaper by the second, why is Glendale trying to turn back the clock? And at the expense of Eagle Rock?

71-2

For shame!

I am especially concerned about how this project will affect air quality, pollution, traffic, and noise, as well as the potential unforeseen issues that may arise from this project. I understand that there is a MND available, and I have looked at it. Expecting residents to pour through a 35 page document is not adequate and seems like an intentional decision on the part of the city of Glendale to keep us from having our concerns addressed. We are your neighbors and will be impacted by this project. We deserve a public hearing.

71-3

71-4

71-5

71-6

71-6

Why has Glendale refused to extend this comment period or hold a local hearing?

71-7

Sincerely,

Timothy Campbell  
[1318 Las Flores Dr.](#)  
[Eagle Rock, CA 90041](#)

From: [ANTONIO B.](#)  
To: [Joe. Dennis](#)  
Subject: Biogas Renewable Generation Project  
Date: Friday, October 20, 2017 12:39:47 PM

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72

**Hello Joe,**

**I would like to show my Support for the Biogas Renewable Generation Project. Further I would like to suggest that the carbon credits funds be used for education.**

72-1

**As the California Education Manager, NWF. I would to like volunteer to develop educational programming that would educate the community about biogas energy and other sustainability measures. I think it would be great to engage the surrounding school in the process of constructing the plant and the power it will be generating.**

72-2

**Again I would like to support the proposal, known as the [Biogas Renewable Generation Project](#), consists of Glendale building and operating a 12-megawatt power generation facility. The power plant would be powered by the biogas, mainly methane, that they would collect from the biodegradation of the landfill's contents.**

72-3

Thank you,

Tony Bautista  
626-241-7771



**From:** [Frank DeFoe](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [info@ernc.la](mailto:info@ernc.la); [Deneane Stevenson](#)  
**Subject:** Another Porter Ranch coming??  
**Date:** Friday, October 20, 2017 4:55:57 PM

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73

Glendale Planning Department:

Please pass this on to the Glendale Council person responsible for Eagle Rock.

Glendale's top tier folks have not shown a Good-Neighbor Policy to Eagle Rock's stakeholders. Instead, it is the ruling Big Brother telling us what they are going to do!

We live less than ½ mile from this proposed plant. The danger of a disaster from natural causes and/or man-made degradation of the infrastructure is in the future. There are not enough protections known to man to protect our Eagle Rock 100%.

There must be a better way than living with a 'cloud' over our heads waiting for another Porter Ranch to happen!

Thank you for listening,

Trish and Frank DeFoe  
5327 Mount Helena Avenue  
Eagle Rock, CA 90041

73-1

73-2

73-3

**From:** Zurn, Stephen  
**Sent:** Monday, October 23, 2017 10:17 AM  
**To:** Joe, Dennis  
**Cc:** Krause, Erik  
**Subject:** Fwd: Another Porter Ranch coming??

FYI. MND comment.

Begin forwarded message:

**From:** "Frank DeFoe" <[frankdefoe@sbcglobal.net](mailto:frankdefoe@sbcglobal.net)>  
**Date:** October 20, 2017 at 5:35:06 PM PDT  
**To:** <[vgharpetian@glendaleca.gov](mailto:vgharpetian@glendaleca.gov)>, <[pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov)>, <[anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov)>, <[zsinanyan@glendaleca.gov](mailto:zsinanyan@glendaleca.gov)>, <[vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov)>, <[szurn@Glendaleca.gov](mailto:szurn@Glendaleca.gov)>  
**Cc:** "Deneane Stevenson" <[twsenough@aol.com](mailto:twsenough@aol.com)>, <[info@ernc.la](mailto:info@ernc.la)>  
**Subject:** Another Porter Ranch coming??

Glendale City Council:

It is not apparent that you top tier folks have not shown a Good-Neighbor Policy to Eagle Rock's stakeholders. Instead, you appear to be the ruling Big Brother telling us what you are going to do!

We live less than ½ mile from this proposed plant. The danger of a disaster from natural causes and/or man-made degradation of the infrastructure is in the future. There are not enough protections known to man to protect our Eagle Rock 100%.

There must be a better way than living with a 'cloud' over our heads waiting for another Porter Ranch to happen!

Thank you for listening,

Trish and Frank DeFoe  
5327 Mount Helena Avenue  
Eagle Rock, CA 90041

74-1

74-2

74-3

**From:** [Veronica Diaz](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Eagle Rock bears virtually all the negative effects of the dump - Glendale's Biogas Generation Project  
**Date:** Friday, October 20, 2017 9:57:51 AM

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75

Mr. Joe -

Eagle Rock bears virtually all the negative effects of the dump since it's located above ER off of Figueroa. Eagle Rock residents have not been given a public meeting from Glendale to discuss emissions and pollution emanating from the Biogas plant which borders Eagle Rock. The People of Eagle Rock deserve a public meeting about the possible negative effects of a Biogas facility in close proximity to residential area.

75-1

Thank you.

Sincerely,

Veronica Diaz

**From:** [Walter Kasha](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Submission of Public Comment for Scholl Canyon Biogas Renewable Generation Project MND  
**Date:** Monday, October 23, 2017 3:49:51 PM

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76

## Scholl Canyon Letter

Oct. 20, 2017

Mr. Dennis Joe  
Case Planner  
Community Development Department Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Submission of Public Comment for Biogas Renewable  
Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact(s):

### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects (landfill expansion and anaerobic digester).

76-1

76-2

3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

76-3

## Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

76-4

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

76-5

## Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

76-6

## Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

76-7

Best regards,

Walt Kasha  
Bachelor of Arts, Microbiology  
Masters, Organic Chemistry

2418 Bywood Dr.  
Glendale CA 91206



From: [Brian Medina](#)  
To: [Joe. Dennis](#)  
Date: Saturday, October 21, 2017 1:19:14 PM

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77

Re: Submission of Public Comment for Biogas Renewable Generation Project MND Dear Mr. Joe: This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

Air Quality:

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 77-1
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 77-2
3. The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. 77-3

Hazards:

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 77-4
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. 77-5

Geology:

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located. Cumulative 77-6

Impacts:

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. 77-7

Best regards,

Brian F. Medina

Sent from my iPhone

Sent from my iPhone

From: [daniel.kruse](#)  
To: [Joe.Dennis](#)  
Subject: Scholl Canyon  
Date: Saturday, October 21, 2017 1:01:42 PM  
Attachments: [Scholl Canyon.docx](#)

---

78

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power

**Re: Submission o**

141 N. Glendale Avenue  
Glendale, CA 91206

[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

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2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,

.Dan Kruse GLENOAKS canyon

Thank you,

--

The finest compliment I could ever receive is a referral from you, my friends and clients.

78-1  
78-2  
78-3  
78-4  
78-5  
78-6  
78-7

Coldwell Banker Powered By Zip  
Office/Cell: (917) 653-7121

DAN KRUSE REALTOR

\*\*\*\*\*

October 18, 2017

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power

**Re: Submission o**

141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Dan Kruse GLENOAKS canyon.

**From:** [Dan Brotman](#)  
**To:** [Joe. Dennis](#)  
**Cc:** [Daniel Brotman](#)  
**Subject:** Comment on Biogas Renewable Generation Project MND  
**Date:** Saturday, October 21, 2017 12:05:04 AM

---

79

Dear Mr Joe,

I am writing to express several concerns and questions with respect to the MND process for the biogas renewable generation project at Scholl Canyon.

The biogas project is being necessitated by the fact that GWP intends to remove units 3,4 and 5 at Grayson that currently burn a mixture of landfill and natural gas. If GWP were not to remove those units, the proposed generators at Scholl would be unnecessary. By removing the units, GWP is required to find an alternative solution to managing the biogas. The alternative solution that has been proposed is a set of generators at Scholl. Given the fact that these projects are integrally related, it is inappropriate and likely in violation of the CEQA framework to treat these projects separately. Further, by combining the Scholl and Grayson projects, GWP would be proposing a combined project in excess of 50 MW and hence require review by the CEC. GWP needs to demonstrate that they have a clear legal basis to treat these separately and are not simply doing so to fall under the threshold that would require CEC review. Please provide said justification and please show that it has been fully vetted by the CEC or other state or county authorities.

As for the merits of burning biogas on site as opposed to at Grayson, GWP should be considering relative health effects based on a study of current and projected population densities and sensitive sites in the two locations. Has such a relative study been conducted and, if not, why not? Similarly, has GWP studied the relative risks from fires, earthquake and flooding at the two locations to determine which introduces the least community harm and/or operational risk? If not, why not?

As far as mitigation is concerned, regardless of the question of significance threshold, burning landfill gas at Scholl will introduce increased airborne pollutants into a residential area on both sides of the Glendale/Eagle Rock border. How is GWP prepared to compensate the neighboring communities for the increased health risks which these pollutants will bring? My suggestion would be for GWP to offer compensation in the form of a firm commitment to close the Scholl Canyon dump to any additional waste disposal by a date certain, and to fund improvements in the dump area to provide healthy open space to the nearby community. Is GWP willing to provide such compensation and, if not, why not?

Regarding the claim that burning biogas will provide renewable credits for GWP to apply toward RPS standards, to what extent will these credits be impacted by possible mixing of natural gas pumped up from Grayson to maintain the required heat rate? Will the mixture of bio and natural gas be treated together as RPS eligible? As RPS ineligible? And how will changes in the mix of bio and natural gas affect the criteria pollutants and other toxic air emissions produced by the generators? Have these variations been clearly explained to the affected communities?

After installing the biogas generators, will GWP no longer have any need to flare landfill methane? Under what circumstances will it continue to flare this methane? Have the environmental impacts of relative methane emissions been clearly spelled out in the MND? If not, I request they be clearly described and quantified in a final report.

Best regards,

Daniel Brotman  
1641 Fernbrook Pl  
Glendale, CA 91208

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79-8



**From:** [Hury](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Saturday, October 21, 2017 9:36:48 PM

---

Mr. Dennis Joe, Case Planner

Community Development Department

Planning Division Office

Glendale Water and Power

Re: Submission o

141 N. Glendale Avenue

Glendale, CA 91206

[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

80-1

2. The study (MND) does not factor in the emissions from the current landfill and other

80-2

proposed projects. (landfill expansion and anaerobic digester)

3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

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#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion.. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

80-4

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista

have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There

are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are

located.

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Hury Babayan

Sent from my iPhone

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**From:** [Jane Demian](#)  
**To:** [Joe, Dennis](#); [Gharpetian, Vartan](#); [Devine, Paula](#); [Najarian, Ara](#); [Sinanyan, Zareh](#); [Agajanian, Vrej](#); [Zurn, Stephen](#)  
**Cc:** [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org); ["Martin Schlageter"](#)  
**Subject:** SCHOLL CANYON - PROPOSED BIOGAS FACILITY / REQUEST FOR PUBLIC MEETING IN EAGLE ROCK  
**Date:** Saturday, October 21, 2017 12:25:12 PM

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I am writing regarding the Scholl Canyon gas plant that the City of Glendale is proposing to build which will coincide with the expansion of the Grayson Plant in Glendale.

81-1

As a resident of Eagle Rock, I am concerned about several features of these expansions:

- There is an earthquake fault line running under the Scholl Canyon landfill. In the event of an earthquake will the gas facility erupt into explosions and fire endangering nearby residents? How will the City of Glendale protect the gas facility and nearby structures from such an occurrence?
- Environmental pollution from plant emissions is another concern as particulate matter from both the Scholl Canyon biogas facility and the expanded Grayson facility may lodge in the lungs of residents living nearby causing chronic disease.
- The landfill was originally designed to be taken off-line after a certain number of years; the date of that closure has long since passed. The reason for closing the landfill is because it does not have an adequate lining to protect the underlying rock structures and groundwater from toxic pollution. Building a biogas facility will only prolong the landfill's life and cause hazardous materials to continue to leak into the underlying structures.
- The City of Glendale is making money from the landfill. The biogas facility will be generating electricity for Glendale from the greenhouse gases emanating from the decaying landfill contents. So in both instances the City of Glendale benefits economically, and therefore may be reluctant to fully appreciate the hazards posed by operating facilities of this kind. However, in light of environmental hazards I think the City of Glendale needs to take these concerns seriously.

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The City of Glendale has not provided adequate information to the residents of Eagle Rock regarding the Scholl Canyon biogas project. At the very least, the City of Glendale needs to provide a public meeting in Eagle Rock so that Eagle Rock residents can learn about the proposed facility and make informed decisions regarding a project of this kind in such close proximity to our community. Providing a comment period without a public meeting is like putting the cart before the horse.

81-6

Thank you.

Jane Demian  
Assembly District 51 Delegate  
2132 Ridgeview Avenue  
LA CA 90041

From: [Patricia Hill](#)  
To: [Joe, Dennis](#)  
Subject: Biogas Renewable Generation Project  
Date: Saturday, October 21, 2017 8:57:46 PM

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Mr. Dennis Joe, Case Planner Community Development Department Planning Division Office Glendale Water and Power, 141 N. Glendale Avenue, Glendale, CA 91206 Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s): Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located. Cumulative Impacts

2. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,  
Pat Hill

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4031 Karen Lynn Drive,  
Glendale 91206

**From:** [AV](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Re: Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Sunday, October 22, 2017 5:31:15 PM

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Mr. Dennis Joe, Case Planner Community Development Department Planning Division Office  
Glendale Water and Power 141 N. Glendale Avenue Glendale, CA 91206

[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov) Re: Submission of Public Comment for Biogas Renewable Generation Project MND Dear Mr. Joe: This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s): Air Quality 1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located. Cumulative Impacts 1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. Best regards,

Angela Vukos

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**From:** [Socorro Vilches](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Re: Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Sunday, October 22, 2017 7:24:38 PM

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Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power

141 N. Glendale Avenue  
Glendale, CA 91206

[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester).
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion.. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

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## Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

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## Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

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Best regards,  
Art and Socorro Vilches  
2324 Blackmore Drive

Sent from my iPhone

**From:** [Lynn](#)  
**To:** [Joe, Dennis](#)  
**Subject:** UNcool  
**Date:** Sunday, October 22, 2017 12:31:34 PM

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85

Hello Mr Joe.

You and the Glendale city leaders must stop disregarding the residents of Eagle Rock when you plan to add even more danger and pollution to our neighborhood through the Scholl Canyon dump. Not only do we NOT want a gas generator at the dump (and no, this natural gas is not "clean," let alone the kind of pollution that would be spewed out while building such a device), but according to reports it is technologically ill-advised to install such a thing into an aging system with potentially faulty pipes that are likely to become obsolete in the near future. So why not pursue clean-air options instead? There ARE viable choices.

The mountain of evidence indicating the harmful effects of your current proposed project is overwhelming. But as usual, Glendale (i.e., you) presents a profile in cowardice and disrespect towards the community that continues to be most adversely affected by your decisions involving this massive cesspool of fetid garbage (e.g., Scholl Canyon) in OUR backyard. The most recent of these decisions was to try blocking even a hearing of Eagle Rockians' perspectives on this addition of the gas generator! Thankfully, at the last minute the county Dept. of Public Works has extended the deadline for public comment, but this doesn't mitigate the fact that your decisions and tactics are insensitive, dishonest, unethical, and contrary to intelligent and decent politics. Congratulations and shame on you, Glendale: You've proven yourselves to be on a par with the Trump White House.

Lynn Woods

Sent from my iPhone

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**From:** [Madeleine Avirov](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Public Comment regarding the Biogas Renewable Generation Project MND  
**Date:** Sunday, October 22, 2017 3:35:19 PM

Mr. Dennis Joe, Case Planner Community Development Department Planning Division Office  
 Glendale Water and Power 141 N. Glendale Avenue Glendale, CA 91206 Re: Submission of  
 Public Comment for Biogas Renewable Generation Project MND Dear Mr. Joe: This letter is to  
 comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I  
 am concerned about the following impact (s): Air Quality 1. The power generator will exceed the  
 AQMD thresholds for criteria pollutant emissions (NO2,CO, VOC, and PM2.5). The City is  
 planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these  
 pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not  
 factor in the emissions from the current landfill and other proposed projects. (landfill expansion  
 and anaerobic digester) 3 The methane transport pipes will be disconnected during construction  
 and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants,  
 power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by  
 residential communities and is located in an area that is deemed a fire hazard by the Glendale  
 Fire Department and the State of California. The proposed 60,00 gallon tank of water does not  
 sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry  
 grasses, and brush blanketing the hills. 2. Nearby neighborhoods of Glenoaks Canyon, Chevy  
 Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to  
 numerous residents if there is a major explosion and following rapid-spreading fire. Geology 1.  
 There are several fault lines within close proximity to the proposed generator. There are no  
 proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there  
 are several homes within meters, and where children's baseball fields are located. Cumulative  
 Impacts 1. The City has not taken into account the cumulative health and environmental impacts  
 of all three pending projects: the power generators, the anaerobic digester facility, and the landfill  
 expansion. Best regards,

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Madeleine Avirov

**From:** [mo.perkins](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Sunday, October 22, 2017 7:52:51 PM

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87

Dear Mr. Dennis Joe, Case Planner, This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. As a homeowner and a mother of a young child living near Scholl Canyon, I am concerned about the following impacts:

Air Quality 1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 2. Nearby neighborhoods are full of residential homes, like mine, and besides the cost and devastation of fires, they have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located. Cumulative Impacts 1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Sincerely,

Maureen Perkins

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**From:** [Mitchell Rubinstein](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Sunday, October 22, 2017 12:35:32 PM

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Dear Mr. Joe: This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s): Air Quality 1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located. Cumulative Impacts 1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. Best regards,

Mitchell Rubinstein

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**From:** [renee holt](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon Dump  
**Date:** Sunday, October 22, 2017 4:05:33 PM

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Re: Submission of Public Comment for Biogas Renewable Generation Project MND Dear Mr. Joe: This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s): Air Quality 1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located. Cumulative Impacts 1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. Thank you for your time.. Renee Holt : resident of Glenoaks Canyon

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**From:** [Betsy Castillo-Cifuentes](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Submission of Public Comment for Biogas Renewable Generation Project MND  
**Date:** Monday, October 23, 2017 2:30:23 PM  
**Attachments:** [1Submission of Public Comment for Biogas Renewable Generation Project MND.pdf](#)

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Dear Mr. Joe,

Attached please find my submission of public comment for the Biogas Renewable Generation Project (Scholl Canyon).

Than you,

Bethsaida A. Castillo-Cifuentes

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206

Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe,

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 90-1
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (Landfill expansion and anaerobic digester) 90-2
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. 90-3

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 90-4
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. 90-5

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located. 90-6

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. 90-7

Best regards,

Bethsaida A. Castillo-Cifuentes  
2215 E. Glenoaks Blvd.  
Glendale, CA 91206

**From:** [Krause, Erik](#)  
**To:** [Joe, Dennis](#)  
**Subject:** FW: Objection to Grayson Re-Powering and Scholl Canyon Biogas Proposals  
**Date:** Wednesday, October 25, 2017 9:34:23 AM

Please include these comments for the bio gas project.

**From:** Jenny Hoffman [mailto:jennyhoffman88@gmail.com]  
**Sent:** Monday, October 23, 2017 9:16 AM  
**To:** Krause, Erik  
**Subject:** Re: Objection to Grayson Re-Powering and Scholl Canyon Biogas Proposals

Thank you Erik. Can you please confirm the comments will also be included in the School Canyon report to the extent it is a separate file? Thank you!

Sent from my iPhone

On Oct 23, 2017, at 9:03 AM, Krause, Erik <[EKrause@Glendaleca.gov](mailto:EKrause@Glendaleca.gov)> wrote:

Ms. Hoffman:

Thank you for your comments on the Draft EIR for the Grayson Repowering Project. Your comments will be forwarded to the decision makers for review and consideration and included in the response to comments as part of the Final Environmental Impact Report.

Sincerely,

Erik Krause, Deputy Director of Community Development • City of  
 Glendale • Community Development Department  
 633 E. Broadway, Room 103 • Glendale, CA 91206 • (818) 937-8156 • [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)

[<image001.jpg>](#) [<image002.jpg>](#) [<image003.jpg>](#) [<image004.jpg>](#)

**From:** Jenny Hoffman [mailto:jennyhoffman88@gmail.com]  
**Sent:** Friday, October 20, 2017 4:28 PM  
**To:** Krause, Erik  
**Subject:** Fwd: Objection to Grayson Re-Powering and Scholl Canyon Biogas Proposals

----- Forwarded message -----

From: **Jenny Hoffman** <[jennyhoffman88@gmail.com](mailto:jennyhoffman88@gmail.com)>  
 Date: Fri, Oct 20, 2017 at 4:27 PM  
 Subject: Objection to Grayson Re-Powering and Scholl Canyon Biogas Proposals  
 To: [ekraus@glendale.ca.gov](mailto:ekraus@glendale.ca.gov)  
 Cc: [vgharpetian@glendaleca.gov](mailto:vgharpetian@glendaleca.gov), [pdevine@glendaleca.gov](mailto:pdevine@glendaleca.gov),  
[zsinanyan@glendaleca.gov](mailto:zsinanyan@glendaleca.gov), [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov),  
[vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov), [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Krause,

I am a parent of a student at Benjamin Franklin Magnet Elementary in Glendale, and a resident of Eagle Rock.

I write to ask the Mayor and City Council to put the Grayson and Scholl Canyon projects on hold while an independent study is commissioned to assess clean energy alternatives and the environmental impact of the proposals.

Expanding Grayson will increase the pollution in the already-polluted air my daughter breathes at her school (which is near the 134 and 5 freeways). Even before the proposed plant is operational, the contaminants on the site may be released into the air during construction and travel to nearby school and neighborhoods, including Ben Franklin. I along with other Ben Franklin parents are already concerned about the health impacts the current level of air pollution has on our children - we need to improve the air our children breathe every day, not make it worse.

The School Canyon proposal may have the same detrimental impact on the air my daughter and family breathe at home in our neighborhood of Eagle Rock.

Please do the responsible thing for the City of Glendale, its students, and neighbors - commission a study to understand the impact of the proposals and explore cleaner, healthier alternatives.

Thank you,

Jennifer Hoffman  
cell: [323-573-3667](tel:323-573-3667)

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● 91-5  
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**Krause, Erik**

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**From:** Mark Whitney <immarkwhitney@gmail.com>  
**Sent:** Monday, October 23, 2017 5:13 PM  
**To:** Krause, Erik; Joe, Dennis  
**Subject:** landfill gas burning at Scholl Canyon Dump

Hello,

Please do not consider this. The Scholl Canyon Dump is surrounded by very nice residential areas which do not want pollution factories anywhere near us. This will adversely affect our air quality and will affect children who are susceptible to asthma by breathing the byproducts created by burning these gasses.

- mark whitney -

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**From:** [Matthew Paine](#)  
**To:** [Joe, Dennis](#)  
**Subject:** Glendale Landfill  
**Date:** Monday, October 23, 2017 12:58:44 PM

---

Dear Joe,

My name is Matthew Paine and I am a homeowner in North East Eagle Rock. My house is arguably the single most impacted by the operations of the Glendale Landfill, as I'm the last house on N Figueroa St (and the north most of 7 houses north of the 134).

On a daily basis we deal with:

- Truck noise
- Truck pollution
- Trucks making the wrong turn and coming up our street (where they, of course, turn around in my driveway - being the last house on the block). My driveway has actually sunken about 2 inches due to the heavy load of trucks constantly backing over it.
- Worries regarding the safety of my children, and the other neighborhood children (our street is incredibly thin, making truck traffic very dangerous)
- A lot of illegal dumping on our block, from lazy truckers wanting to offload piles of dirt and rocks rather than paying to do the same up the road
- Random issues of incredibly obnoxious smells, depending on what the trucks are hauling

My wife and I would like to voice our strong opposition to any expansion of this landfill.

With warm regards,  
Matthew Paine

**From:** [Randall Wise](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Biogas Renewable Generation Project  
**Date:** Monday, October 23, 2017 11:10:52 AM

Community Development Department Planning Division Office Glendale Water and Power Re: Submission o 141 N. Glendale Avenue Glendale, CA 91206 [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov) Re: Submission of Public Comment for Biogas Renewable Generation Project MND Dear Mr. Joe: This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s): Air Quality 1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. Hazards 1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. Geology 1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located. Cumulative Impacts 1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion. Best regards,

Randall Wise  
 2105 Hollister Ter.  
 Glendale, CA 91206

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**From:** [Brooke Owen](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Scholl Canyon  
**Date:** Sunday, October 29, 2017 6:56:00 PM  
**Attachments:** [Letter re Scholl Canyon Pjt.docx](#)

---

Dear Mr. Joe,

Please see my letter attached regarding my concerns over this project in Scholl Canyon.

Best regards,  
Brooke Owen

Mr. Dennis Joe, Case Planner

Community Development Department Planning Division Office

Glendale Water and Power Re: Submission o 141 N. Glendale Avenue Glendale, CA 91206

Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
3. The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play and there are several homes within meters, and children’s baseball fields are located.

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,

Brooke Owen

2312 Gardner Place, Glendale, CA 91206

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**From:** [Burt Culver](#)  
**To:** [Krause, Erik](#); [Joe, Dennis](#)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Agajanian, Vrej](#); [Sinanyan, Zareh](#); [Najarian, Ara](#)  
**Subject:** Public Comments for Grayson EIR and Biogas project 2  
**Date:** Tuesday, October 31, 2017 3:39:38 AM

Public comments on Biogas Renewable Project and Grayson Expansion/Repowering

I am concerned about the Biogas Renewable Project and the Grayson Expansion project. The biogas from Scholl Canyon Landfill is currently being burned at Grayson. GWP wants to rebuild and expand Grayson and stop burning the biogas at the Grayson site. To handle the biogas, GWP is currently planning under a separate non-CEQA process to build a new 12MW plant at the Scholl Canyon Landfill to burn this gas.

96-1

According to the CEQA guidelines

([http://resources.ca.gov/ceqa/docs/2016\\_CEQA\\_Statutes\\_and\\_Guidelines.pdf](http://resources.ca.gov/ceqa/docs/2016_CEQA_Statutes_and_Guidelines.pdf))

"15165. MULTIPLE AND PHASED PROJECTS

Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the

scope of the larger project. Where one project is one of several similar projects of a public agency,

but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR

for all projects, or one for each project, but shall in either case comment upon the cumulative effect.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21061, 21100,

and 21151, Public Resources Code; Whitman v. Board of Supervisors, (1979) 88 Cal. App. 3d 397."

96-2

These projects are inextricably entwined. The Scholl Canyon Landfill 12MW plant is a necessary precedent for the Grayson plant expansion and they must be considered together.

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

96-3

Burt Culver  
 Glendale

From: [Amy Koss](#)  
To: [Joe. Dennis](#)  
Subject: Re: Submission of Public Comment for Biogas Renewable Generation Project MND  
Date: Thursday, November 02, 2017 5:22:37 PM

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97

Community Development Department  
Planning Division Office  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

### **Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. 97-1
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester) 97-2
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months. 97-3

### **Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills. 97-4



2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

97-5

### **Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

97-6

### **Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

97-7

Best regards,  
Amy Goldman Koss,

Glendale home owner and voter.

---

Amy Goldman Koss  
[www.AmyGoldmanKoss.net](http://www.AmyGoldmanKoss.net)  
[AmyKossBlogThang.blogspot.com](http://AmyKossBlogThang.blogspot.com)

November 2, 2017

98

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

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This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

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- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

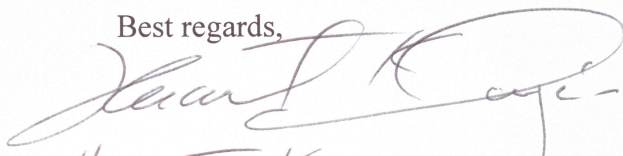
**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,

  
HERANI KHANJIAN  
341 EDWARDS PL.  
GLENDALE 91206

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**To:** Joe, Dennis  
**Subject:** FW: Comments on Biogas Project

99

Did I already give this to you?

Erik Krause, Deputy Director of Community Development • City of Glendale • Community Development Department  
633 E. Broadway, Room 103 • Glendale, CA 91206 • (818) 937-8156 • [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)



**From:** James Flourney [<mailto:saveourcommunitysgv@gmail.com>]  
**Sent:** Thursday, November 02, 2017 7:07 PM  
**To:** Krause, Erik  
**Subject:** Comments on Biogas Project

Attached please find our comments on the Negative Declaration  
Biogas Comments  
and specific comments on  
Seismology

Dr Syndor was head of CGS "essential Services Structures, Schools, and Hospitals "review  
division  
do not be misled by Schools and Hospitals in the title  
Being from 2005 it is keyed to the UBC 1998-2002  
All guidelines must be updated to the latest CBC (now 2017) and the Latest ASCE 7-16  
FEMA NEHRP are good sources of commentaries to provide clarity- Latest is 2015  
The hilltop location is going to take some additional work- we think that ECI who did your  
General Plan would be top of the list They did some seismology for us in the City of  
Rosemead and for out General Plan.

let us know how we can help

99-1



November 9, 2017

Save Our Community SGV  
c/o 8655 Landis View Lane  
Rosemead CA 91770

Erik Krause  
Interim Deputy Director of Community Development,  
City of Glendale Community Development Department Planning Division  
633 E. Broadway, Room 103 Glendale, California 91206  
[EKrause@glendaleca.gov](mailto:EKrause@glendaleca.gov)

Comments on Negative Declaration for  
Glendale Biogas Renewable Generation Project  
Scholl Canyon Landfill  
7721 N Figueroa St, Eagle Rock  
Los Angeles Ca 90041

Gentlemen:

We are in favor of this project and comments are meant to be helpful and constructive  
FIRST if you have almost any structures for human habitation, even a 1000 sq ft one, you have to  
comply with the Seismic Hazards Mapping ACT  
SEE SHMA RELEVANT CITATIONS- ATTACHED

second see Seismology comments, hilltop amplification, long-period ground-motion, etc

WE think the project could be re-purposed to include an emergency backup utilization.  
There should be enough capacity to power emergency communications especially as Flint Peak is  
nearby, and some power lines but we do not know whose.

It is possible for the project to be operational while the main plant is down in and emergency.  
Could you add a large CNG backup tank.?  
Are these engines capable of dual fuel?

California Building Code

While we agree that the CBC is stricter than most have the more recent codes of New Zealand, Taiwan,  
and Japan been considered. California is not current especially as to TANKS, we see tanks in the  
vicinity of the project. Are they safe?

The NEG DEC Does Not Comply with CEQA

a.

The NEG DEC Does Not Consider an Adequate Range of Feasible Mitigation  
CEQA was enacted to ensure that public agencies do not approve projects unless

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feasible measures are included that mitigate the project's significant environmental effects.

CEQA therefore requires that "each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so."

The mitigation measures must be enforceable and the benefits quantifiable, rather than just vague policy statements.

The Neg Dec Does Not Consider an Adequate Range of Feasible Mitigation  
CEQA was enacted to ensure that public agencies do not approve projects unless feasible measures are included that mitigate the project's significant environmental effects.

It is unclear how the San District could be lead agency for one project and City of Glendale another?

Who's on first?

See:

[Scholl Canyon Landfill Draft Environmental Impact Report Notice of Availability](#)

"The Sanitation Districts, acting on behalf of the City of Glendale, have prepared a Draft Environmental Impact Report to address potential impacts from implementation of the proposed Scholl Canyon Landfill Expansion. The Sanitation Districts will serve as the primary project contact during the public review period. "

San District condensate, groundwater

earthquake

Water tank graded area

Pipelines Natural gas, water

Flare System

Location 3001 Scholl Canyon Road or 7721 N Figueroa St, which is it? Or both?

Geographical location must also be provided here not buried in the text

34.153425°, -118.192518

2.3.1 Renewable energy ?? How is this project "**Renewable**" when it it depleted in 20 years?

Provide an analysis on the existing conversion of gas to energy at the Power Plant- energy produced and pollution generated and compare with net energy produced and pollution generated by this project.

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Pollutants of concern in the air basin include ozone, the chemical commonly called “smog,” which may permanently decrease lung function; and particulate matter, which impairs lung function and can exacerbate asthma.

Small particulate matter (2.5 microns in size or less), a component of diesel exhaust, is of particular concern, because it can penetrate deeply into the lungs, bypassing the body’s defenses, and can carry carcinogens on the surface of the particles.

American Lung Association, State of the Air 2011, at pp. 11, 13.  
New England Journal of Medicine, vol. 351, no. 11, pp. 1057-1068 (2004).

CARB

See LA Times 5/10/2017 attached

CARB requires Mitigation requiring latest earth-movers and construction equipment tier 4 off road

CARB has a list of measures which must be addressed

All off road equipment (earth movers etc.) must be Tier 4 Final Compliant

All on road equipment/ trucks, bottom dumps, material delivery, cement mixers must utilize 2010 Engines or Cleaner-

there must be mitigation measures addressing

Guidance on siting incompatible land uses can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address:

<http://www.arb.ca.gov/ch/handbook.pdf> or

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0>

<http://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-offroad-final.pdf?sfvrsn=2>

AQMD also has a handbook of Mitigation measures which must be addressed, see below

Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 718 [citing Cal. Code Regs., tit. 14, § 15064, subd. (b)];  
see also id. at 721.)

Accordingly, the significance of any added pollutant emissions must be judged in the context of an air basin that already exceeds health-based federal air quality standards.

WE would like it shown that this project reduces air pollution versus the current operation utilizing the power plant

99-14

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reciprocating engine generators

Show why reciprocating engine generators were selected versus turbines

Provide a maintenance mitigation plan including lubricating oil analysis (due to the usual nasty composition of biofuel from landfills)

99-17

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document.

Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary.

99-18

Guidance for performing a localized air quality analysis can be found at

<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment.

Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling

Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address:

99-19

[http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html).

An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

#### Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts.

To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to

Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures.

99-20

Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)



Additionally,

SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

This document can be found at the following internet address:

<http://www.aqmd.gov/prdas/aqguide/aqguide.html>

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/mitigation-measures-and-control-efficiencies/fugitive-dust/fugitive-dust-overview.pdf?sfvrsn=2>

AQMD Rule 1466 may be revised in December 2017- see their upcoming rule amendments

see also rule 1166

<http://www.aqmd.gov/home/regulations/compliance>

<http://www.aqmd.gov/docs/default-source/rule-1466>

AQMD Non refinery flare rules are coming, please anticipate.

Data Sources:

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039.

Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage <http://www.aqmd.gov>

A summary of global warming impacts to California, together with citations, is available on the Attorney General's website at

<http://ag.ca.gov/globalwarming/impact.php>

AG mitigation measures [http://ag.ca.gov/globalwarming/pdf/GW\\_mitigation\\_measures.pdf](http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf)

[http://ag.ca.gov/globalwarming/pdf/GW\\_mitigation\\_measures.pdf](http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf)

Greenhouse Gases

The level of GHG emissions has the potential to result in a considerable contribution to cumulative emissions related to global climate change, and would be potentially significant without the implementation of further mitigation.

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<http://www.arb.ca.gov/cc/cc.htm> Climate Change Program or GHG

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/mitigation-measures-and-control-efficiencies/quantifying-greenhouse-gas-mitigation-measures.pdf?sfvrsn=0>

Climate Change

<http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated.

Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions.

In the event that the project generates significant adverse air quality impacts,

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts.

In addition, guidance on sitting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf> see Cal EPA/ARB

Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed

Natural Gas and Water Pipelines- must be ductile with flexible connections and break away valves

Condensate must be recycled and utilized as a beneficial use

No water for landscaping?

Landfill liquids are effluent not condensate

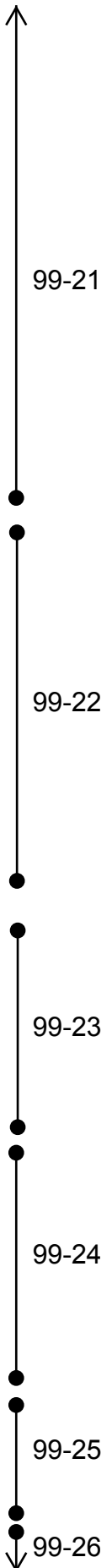
“The life of the Project is anticipated to be 20 years, or as long as the LFG can be used to generate electricity; after which time equipment and equipment foundations would be removed and the area would become part of the landfill reclamation plan. “

We suggest that the site could be used for emergency back-up generation – all that would be required is the natural gas supply- the infrastructure would be fully sunken and the distribution in place please discuss a longer life for the project and it's uses in emergencies

“Both concrete and asphalt would be crushed on-site and transferred to the adjacent landfill by dump trucks”

Crushed concrete and asphalt must be recycled, please explain

Figure 2.3-3 shows the extent of grading.



Where is the geologic and geotechnical report supporting grading plans? Where are the grading plans.  
Where are the volumes of cuts and fills  
Where is the soil analysis showing the gradability of soils or is it rock?

99-26

“During the 15 – 18-month construction phase of Scholl Canyon Landfill Power Plant, the system piping landfill gas to GWP Grayson Power plant will be demolished; “  
Abandoned in place is not demolished. We would prefer mothballing instead of “demolition”

Tanks two tanks 60,000 gal tank if used for fire protection must be analyzed, specified ,designed and constructed as an “essential services structure.”  
Flexible connections, break away valves  
mat foundation,  
no holdowns welded to tank walls – this type of hold down failed in the Moderate Northridge  
Tanks purposed for fire fighting must be engineered as “essential services structures- provide a geotechnical report that supports “essential services structures” and “structures for human habitation”

99-27

Does Glendale have a standard for Geotechnical Reports  
Does Glendale rely on the County of Los Angeles Geotechnical Report guidelines (which we consider a default standard of practice in Southern California unless the Lead Agencia has adopted their own (Los Angeles, Santa Monica for example)  
The General Plan Safety Element was state of the art when adopted  
Please explain the difference between the City of Glendale Building and Safety Code and the CBC?  
Has Glendale adopted or recommend utilizing ASCE-7-16? FEMA NEHRP 2015? which appears to be key for compliance with the EHRA

99-28

We suggest you get the firm that did the fine safety element to your general plan, ECI out of Tustin or Santa Ana to do your SHMA report

99-29

We will have some additional geotechnical comments in our comments on the Power Plant, consider them as included

### 3.5 Geology and Soils

Provide links or attach the Geo-Locic Associates Geotechnical Report and the SAN district DEIR

2005 Geological Map of Los Angeles

CGS Seismic Hazards Map (liquefaction and landslides, RHE GROUND MOTIONS HAVE BEEN RECALLED

Dibblee Map?

General Plan Map?

References

99-30

### Appendix D

Jan 4 2016

99-31

Jaret Fischer, P.E. There is no citation that Fischer is a Geotechnical Professional or a Registered Geotechnical Engineer. There does not appear to be any Stamp of a Certified Engineering Geologist or Earthquake Engineer,

This report presents the results of a geotechnical investigation performed at the request of the City of Glendale, Provide a link to the RFP, scope of work

99-32

Grading Plans since Jan 4, 2016 are there grading plans now?

99-33

5.1

5.2 2008 Seismic Hazards Maps are obsolete.

Please utilize the latest SCEC Community fault Model , Quaternary Fault and Fold database

5.2 Building Code Seismic Criteria are inadequate for essential services projects, design values must be site specific

California Code of Regulations, Title 24, Part 2, 2007 California Building Code (CBC), Chapters 16 and 18. is not current rework report reflecting current CBC and work ahead using ASCE 7-16 and FEMA NEHRP

99-34

CDMG Seismic Hazard Zone Map- the ground motion tables have been canceled- they are obsolete

California Geological Survey (CGS), 2008, <http://www.consrv.ca.gov/cgs>. Is not relevant as it is non specific

International Conference of Building Officials (ICBO), 1997, Uniform Building Code and Maps of Known Active Fault Near-Source Zones in California and Adjacent Portions of Nevada.

UBC near fault methodology is useful as a base line but is not current practice

Use the SCEC fault database for starters <https://www.scec.org/publication/7735> Aug 15, 2017

[http://www.wgcep.org/data-ref\\_fault\\_db](http://www.wgcep.org/data-ref_fault_db)

<https://earthquake.usgs.gov/hazards/qfaults/>

see also

<https://www.scec.org/research/ucvm> Community Velocity Model Version 17.1.0 (Small et al., 2017) or later

[http://scec.usc.edu/scecpedia/Broadband\\_Platform](http://scec.usc.edu/scecpedia/Broadband_Platform)

99-35

## Evaluations of CyberShake simulated motions for use in engineering analysis

<https://www.scec.org/publication/7553>

See Jack Baker <http://web.stanford.edu/~bakerjw/>    [bakerjw@stanford.edu](mailto:bakerjw@stanford.edu)  
SITE EFFECTS   not just VS 30

Seismic waves are similarly modified by local geological conditions. These variations are known as SITE EFFECTS, and they can strongly influence the nature and severity of shaking at a given site.

Site effects include the following five factors.

### 1) The softness of the soil or rock beneath a site. VS-30 is simple version of this

The elastic properties of Earth materials ranges from hard (difficult to deform--think granite) to soft (relatively easy to deform--think mud).

Seismic waves travel faster through hard rocks than through softer rocks and sediments. As the waves pass from deeper harder to shallow softer rocks the slow down and get bigger in amplitude as the energy piles up. The softer the rock or soil under a site is, the larger the wave. Softer soils amplify ground motion.

### 2) The total thickness of soil to bedrock. (we commented that the 2500m/sec depth be plotted)

Related to the direct amplification effects of soft Earth materials, the geometry of the soft deposits can further distort ground motion at soft rock sites. Seismic waves entering sediment-filled valleys can trap seismic energy such that it reverberates like sound in an echo chamber. This can lead to both **higher amplitudes and longer durations of shaking**.

Because such effects are geometric in nature, they depend on the characteristics of the incoming wave, and it's direction of approach...they can be very difficult to predict.

### 3) Sedimentary basins (deep geologic structure).

For this project PATH EFFECTS especially San Andreas

This is essentially the same process as #2 above, but at a broader scale. As such, it impacts the lower frequency seismic waves, and can have more widespread effects and influence larger structures that tend to be more sensitive to low-frequency motions.

Deep sedimentary basins can have a large effect on ground motion above them. Earthquake waves traveling at high velocity through the stiff, crystalline rock of the crust refract and slow dramatically when entering the basin. This increases the amplitude of the earthquake waves, and the sharp density contrast of the soft basin rocks with surrounding material can cause waves to reflect, trapping energy in the basin for a period of time. This extends the duration of shaking. Due to their size, these deep geologic structures can influence shaking over a wide area.

### 4) na

Hillside AND Hilltop amplification must be considered

### 5) Topography

The features present at the Earth's surface have also been identified as having an influence on shaking intensity. Some studies of the distribution of the intensity of shaking experienced in an earthquake concluded that hilltop sites often shook at one intensity level higher than nearby sites with flatter topography.



CGS has a publication and there is data from Northridge and elsewhere.

Northridge (California) Earthquake: Unique Ground Motions Mehmet Celebi U.S. Geological Survey, Menlo Park, CA 1995

<http://scholarsmine.mst.edu/cgi/viewcontent.cgi?article=3246&context=icrageesd>

Effect of Irregular Topography on Strong Ground Motion Amplification

[ftp://140.115.123.63/share/%B0%EA%A9m%AAF%B6%D5%B8%EA%AE%C6/08\\_References/Effe%20ct%20of%20Irregular%20Topography%20on%20Strong%20Ground%20Motion%20Amplification.pdf](ftp://140.115.123.63/share/%B0%EA%A9m%AAF%B6%D5%B8%EA%AE%C6/08_References/Effe%20ct%20of%20Irregular%20Topography%20on%20Strong%20Ground%20Motion%20Amplification.pdf)

“The amplitude ratio at the hilltop is largest, some four or five times that of the free field wave. This large gain is attributed to the focusing of the waves at the hilltop”... The amplification ratio increases, because the reflected waves focus at the hilltop”...”The amplification varies, depending on the shape of the hill slope”...”These results support the contention that amplification characteristics depend on the shape of a slope.”

Bulletin of the Seismological Society of America, Vol. 86, No. 1A, pp. 66-72, February 1996

Seismic Response of a Hill: The Example of Tarzana, California

by Michel Bouchon and Jeffrey S. Barker

<https://gsw.silverchair->

[cdn.com/gsw/Content\\_public/Journal/bssa/86/1A/00371106861A0006/4/BSSA08601A0066.pdf?Expires=1509135343&Signature=LOc-fgrwUcdPwjgJhwiHQlq1jf-tA4bG4TLjIfIOq-PMr7zj-DjEzZk1N5fwOXwZjDiTINI3R4owh7k46E~o83a800PQq-QmxQlwaxEzLyvCyKCaEfblJxQ~DIPItRYb4nu3OvNWI6t9BXmhP9Uljcto80rm5lWlOeiXrX4GBm9dIH0lCZ0r43-s2VjmuPII~Z-x5yrcjqByv~Bw7ecCQ5K4H8lq2RI~Bo2unwjuFlfoM79iibE91sPSjm5DPH1u4R485u8r1zAANTzQIH TSdjwdJt7DJWRCOVM0-MdY~kvqZwc4Q9mB1HNjZSm~EuIL-RAjzmstwTXB1795gAvg\\_\\_&Key-Pair-Id=APKAIUCZBIA4LVPVAVW3Q](https://gsw.silverchair-cdn.com/gsw/Content_public/Journal/bssa/86/1A/00371106861A0006/4/BSSA08601A0066.pdf?Expires=1509135343&Signature=LOc-fgrwUcdPwjgJhwiHQlq1jf-tA4bG4TLjIfIOq-PMr7zj-DjEzZk1N5fwOXwZjDiTINI3R4owh7k46E~o83a800PQq-QmxQlwaxEzLyvCyKCaEfblJxQ~DIPItRYb4nu3OvNWI6t9BXmhP9Uljcto80rm5lWlOeiXrX4GBm9dIH0lCZ0r43-s2VjmuPII~Z-x5yrcjqByv~Bw7ecCQ5K4H8lq2RI~Bo2unwjuFlfoM79iibE91sPSjm5DPH1u4R485u8r1zAANTzQIH TSdjwdJt7DJWRCOVM0-MdY~kvqZwc4Q9mB1HNjZSm~EuIL-RAjzmstwTXB1795gAvg__&Key-Pair-Id=APKAIUCZBIA4LVPVAVW3Q)

The Northridge, California, earthquake that strongly shook the city of Los Angeles in January 1994, produced one of the highest ground accelerations ever recorded in an earthquake, at a site located on top of a small hill in Tarzana

see also references- selected

Hartzell, S. H., D. L. Carver, and K. W. King (1994). Initial investigation of site and topographic effects at Robinwood ridge, California, Bull. Seism. Soc. Am. 84, 1336-1349.

Lee, W. H. K., R. A. White, D. H. Harlow, J. A. Rogers, and P. Spudich (1994). Digital seismograms of selected aftershocks of the Northridge earthquake recorded by a dense seismic array on February 11, 1994 at Cedar Hill Nursery in Tarzana, California, U.S. Geol. Surv. Open- File Rep., 94-234.

Spudich, P., M. Hellweg, and W. H. K. Lee (1996). Directional topographic site response at Tarzana observed in aftershocks of the 1994 North- ridge, California, earthquake: implications for mainshock motions, Bull. Seism. Soc. Am. 86, no. 1B, S193-\$208.

Vidale, J. E., O. Bonamassa, and H. Houston (1991). Directional site resonances observed from the 1

October 1987 Whittier Narrows, California, earthquake and the 4 October aftershock, Earthquake Spectra 7, 107-125.

Curt B. Haselton, Jack W. Baker, Jonathan P. Stewart, Andrew S. Whittaker, Nicolas Luco, Andy Fry, Ronald O. Hamburger, Reid B. Zimmerman, John D. Hooper, Finley A. Charney, and Robert G. Pekelnicky (2017)

Response History Analysis for the Design of New Buildings in the NEHRP Provisions and ASCE/SEI 7 Standard: Part I - Overview and Specification of Ground Motions. Earthquake Spectra: May 2017, Vol. 33, No. 2, pp. 373-395.

[http://web.stanford.edu/~bakerjw/Publications/Baker\\_Lew\\_\(2017\)\\_Multisource\\_GMs\\_PBD.pdf](http://web.stanford.edu/~bakerjw/Publications/Baker_Lew_(2017)_Multisource_GMs_PBD.pdf)

ASCE 7 provides a framework to establish the ground motions **and the newest edition (ASCE 7-16, 2016) provides more guidance in the ways ground motions are to be specified in terms of the acceptable hazard and risk levels as well as criteria for appropriate ground motions to be used in the response history procedures.** ASCE 7-16 now permits the use of ground motions scaled to scenario spectra (conditional mean spectra) as an alternative to the risk targeted uniform hazard spectrum. Despite this guidance from ASCE and the PBEE guideline documents, there are situations that are not yet addressed that could affect the generation of the scenario spectra and the selection and scaling of appropriate time histories.

One of these situations occurs when the hazard disaggregation from the probabilistic seismic hazard analysis indicates that there is not a single dominant seismic source, but rather there may be multiple sources with different predominant magnitudes and distances that significantly contribute to the ground motion hazard at a site. Approaches to account for situations such as this are discussed in this paper to properly account for the different sources and selection and scaling of appropriate time histories.

99-35

[ftp://ftp.mi.ingv.it/download/augliera/Lovati\\_PhD\\_Thesis\\_2011.pdf](ftp://ftp.mi.ingv.it/download/augliera/Lovati_PhD_Thesis_2011.pdf) 13 April 2013

GROUND MOTION AMPLIFICATION

INDUCED BY TOPOGRAPHIC IRREGULARITIES

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2. DATA PROCESSING OF SEISMIC DATA p40

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3. SITE EFFECTS .p49 Italian seismic rules for buildings p 73

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4. TECHNIQUES FOR SITE RESPONSE EVALUATION 83

References p98

5 APPLICATION: TOPOGRAPHICAL EFFECTS AT NARNI RIDGE (CENTRAL ITALY). pg 103

references p 155

TOPOGRAPHICAL EFFECTS, GROUND MOTION PREDICTIONS AND ITALIAN  
SEISMIC CODE FOR BUILDING pg157

References .180

PUBLICATIONS 2008-2011 pg 182

END Lovati thesis

<https://authors.library.caltech.edu/49125/>

Assimaki, D. and Jeong, S. (2013) *Ground-Motion Observations at Hotel Montana during the M 7.0 2010 Haiti Earthquake: Topography or Soil Amplification?* Bulletin of the Seismological Society of America, 103 (5). pp. 2577-2590. ISSN 0037-1106.

<http://resolver.caltech.edu/CaltechAUTHORS:20140902-134021129>

pdf is here [https://authors.library.caltech.edu/49125/1/Assimaki%2C%20Jeong%20-%202013%20-%20Ground-](https://authors.library.caltech.edu/49125/1/Assimaki%2C%20Jeong%20-%202013%20-%20Ground-Motion%20Observations%20at%20Hotel%20Montana%20during%20the%20M%207.0%202010%20Haiti%20Earthquake%20Topography%20or%20Soil%20Amplifica.pdf)

[Motion%20Observations%20at%20Hotel%20Montana%20during%20the%20M%207.0%202010%20Haiti%20Earthquake%20Topography%20or%20Soil%20Amplifica.pdf](https://authors.library.caltech.edu/49125/1/Assimaki%2C%20Jeong%20-%202013%20-%20Ground-Motion%20Observations%20at%20Hotel%20Montana%20during%20the%20M%207.0%202010%20Haiti%20Earthquake%20Topography%20or%20Soil%20Amplifica.pdf)

99-35

**The material-geometry nexus: Understanding topographic effects on wave propagation**

<https://www.scec.org/publication/7740>

[Qianli Chen](#), & [Ahmed E. Elbanna](#) SCEC Contribution #7740, 2017 SCEC Annual Meeting Poster #172 Department of Civil and Environmental Engineering University of Illinois, Urbana-Champaign

Note new 2017 rule Note Upcoming rule amendments in December 2017

<http://www.aqmd.gov/home/regulations/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan>

<http://www.aqmd.gov/home/regulations/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan>

[Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil](#)

Thanks so much for allowing us to make these comments

good luck with your project

Jim Flournoy

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## Seismic Hazards Mapping Act (PRC Div.2 Chapter 7.8) Relevant citations

### 2690 Seismic Hazards Mapping Act

#### 2697 City and County responsibilities

- a.) Cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard...
- b.) In meeting the requirements of this section, cities and counties shall consider the policies and criteria established pursuant to this chapter. {i.e. CGS SP-117A and Policies of the Board}

#### 2698. City or county policies and criteria may be stricter

Nothing in this chapter is intended to prevent cities and counties from establishing policies and criteria which are more strict than those established by the board.

{The City and EIR utilize the Los Angeles County “Manual for the Preparation of Geotechnical Reports”, which are stricter and in greater detail.}

#### 2695. Development of guidelines, priorities, policies, and criteria

Policies and criteria regarding the responsibilities of cities, counties, and state agencies pursuant to this chapter. The policies and criteria shall address, but not be limited to, the following:

- i. Criteria for approval of a project within a seismic hazard zone, including mitigation measures.
- ii. The contents of the geotechnical report.
- iii. Evaluation of the geotechnical report by the lead agency.

#### Criteria for Project Approval

The State's minimum criteria required for project approval within zones of required investigation are defined in CCR Title 14, Section 3724,

"The following specific criteria for project approval shall apply within seismic hazard zones and shall be used by affected lead agencies in complying with the provisions of the Act:

- (a) A project shall be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed.
- (b) The geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist, having competence in the field of seismic hazard evaluation and mitigation. {LA COUNTY REQUIRES BOTH}



The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify portions of the project site containing seismic hazards.

Page 4

The report shall also identify any known off-site seismic hazards that could adversely affect the site In the event of an earthquake.

The contents of the geotechnical report shall include, but shall not be limited to, the following:

- (1) Project description.
- (2) A description of the geologic and geotechnical conditions at the site, including an appropriate site location map.
- (3) Evaluation of site-specific seismic hazards based on geological and geotechnical conditions, in accordance with current standards of practice.
- (4) Recommendations for appropriate mitigation measures as required in Section 3724(a), above.
- (5) Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation. {LA County Manual requires Both}
- (c) Prior to approving the project, the lead agency shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures and to determine the requirements of Section 3724(a), above, are satisfied.

Such reviews shall be conducted by a certified engineering geologist or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation." {SP-117A page 8} {note LA County requires both}

Lead agencies can have other, more stringent criteria for project approval

{LA County Manual for the Preparation of Geotechnical Reports is more stringent}

State Mining and Geology Board

Guidelines for evaluating seismic hazards and recommending mitigation measures.

Regulations and Guidelines are found in Special Publication 117 "Guidelines for Evaluating and Mitigating Seismic Hazards in California" SP-117A 2008

Revised and Re-adopted September 11, 2008 by the State Mining and Geology Board in Accordance with the Seismic Hazards Mapping Act of 1990

<http://www.conservation.ca.gov/smgb/Guidelines/Documents/SP117-091508.pdf>

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The Lead Agency Must independently peer review and specifically approve Geotechnical Reports.

SP-117A pg 1

2) Cities and Counties, or other local permitting authority, must regulate certain development "projects" within the zones. They must withhold the development permits for a site within a zone until the geologic and soil conditions of the project site are investigated and appropriate mitigation measures, if any, are incorporated into development plans.

Page 5

SP 117 A Chapter 8 Guidelines for Reviewing Site-Investigation Reports SP-117A p68

“The required technical review is a critical part of the evaluation process of approving a project.

The reviewer ensures compliance with existing laws, regulations, ordinances, codes, policies, standards, and good practice, helping to assure that significant geologic factors (hazards and geologic processes) are properly considered, and potential problems are mitigated prior to project development.

Under the Seismic Hazards Mapping Act, the reviewer is responsible for determining that each seismic hazard site investigation, and the resulting report, reasonably address the geologic and soil conditions that exist at a given site.

The reviewer acts on behalf of a governing agency— city, county, regional, state, or federal—

not only to protect the government's interest

but also to protect the interest of the community at large “

Review of Submitted Reports SP-117A P70

The review of submitted reports constitutes professional practice and should be conducted as such.

Report Filing Requirements

PRC Section 2697 requires cities and counties to submit one copy of each approved site investigation report, including mitigation measures, if any, that are to be taken, to the State Geologist within 30 days of report approval. SP-117A P71

Los Angeles County Department of Public Works Manual for the Preparation of Geotechnical Reports is even more explicit <http://dpw.lacounty.gov/gmed/manual.pdf>

2.2.6 Seismic Hazard Evaluation Reports p 14 et seq.

Los Angeles County requires signatures of BOTH a Certified Engineering Geologist AND a Geotechnical (soils) civil engineer.



California Geological Service -CGS Note 41

“Guidelines for Reviewing Geologic Reports”

[http://www.conservation.ca.gov/cgs/information/publications/cgs\\_notes/note\\_41](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_41)

The below article confirms that Review standards of practice are longstanding

Hart, E.W., and Williams, J.W., 1978, Geologic review process: California Geology, v. 31, p. 235-236. [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/cg/1978/31\\_10.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/cg/1978/31_10.pdf) p235

“The geologic review is a critical part of the evaluation process of a proposed development.

It is the responsibility of the reviewer to assure that each geologic investigation, and the resulting report, adequately addresses the geologic conditions that exist at a given site.

In addition to geologic reports for tentative tracts and site development, a reviewer evaluates Environmental Impact Reports, “

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LA Times 5/10/2017

Chris Megerian writes about climate change and California for the Los Angeles Times

A legal battle over regulations for construction vehicles could become the first test of whether President Trump wants to limit California's unique ability to limit air pollution.

The issue stems from a 2013 decision by the U.S. Environmental Protection Agency that allowed California to require emission filters on bulldozers, forklifts and other diesel-powered equipment.

The state, the only one in the country allowed to set rules that are tougher than federal standards, has been granted dozens of similar waivers over several decades.

Several companies sued over the waiver, and a court hearing is scheduled for May 18 in the 9th U.S. Circuit Court of Appeals

Now Trump's EPA wants to delay the hearing, and officials said in a Friday court filing that they weren't sure whether the waiver should have been granted.

"Recently-appointed EPA officials in the new administration will be closely scrutinizing [the decision] to determine whether it should be maintained, modified, or otherwise reconsidered," the filing said.

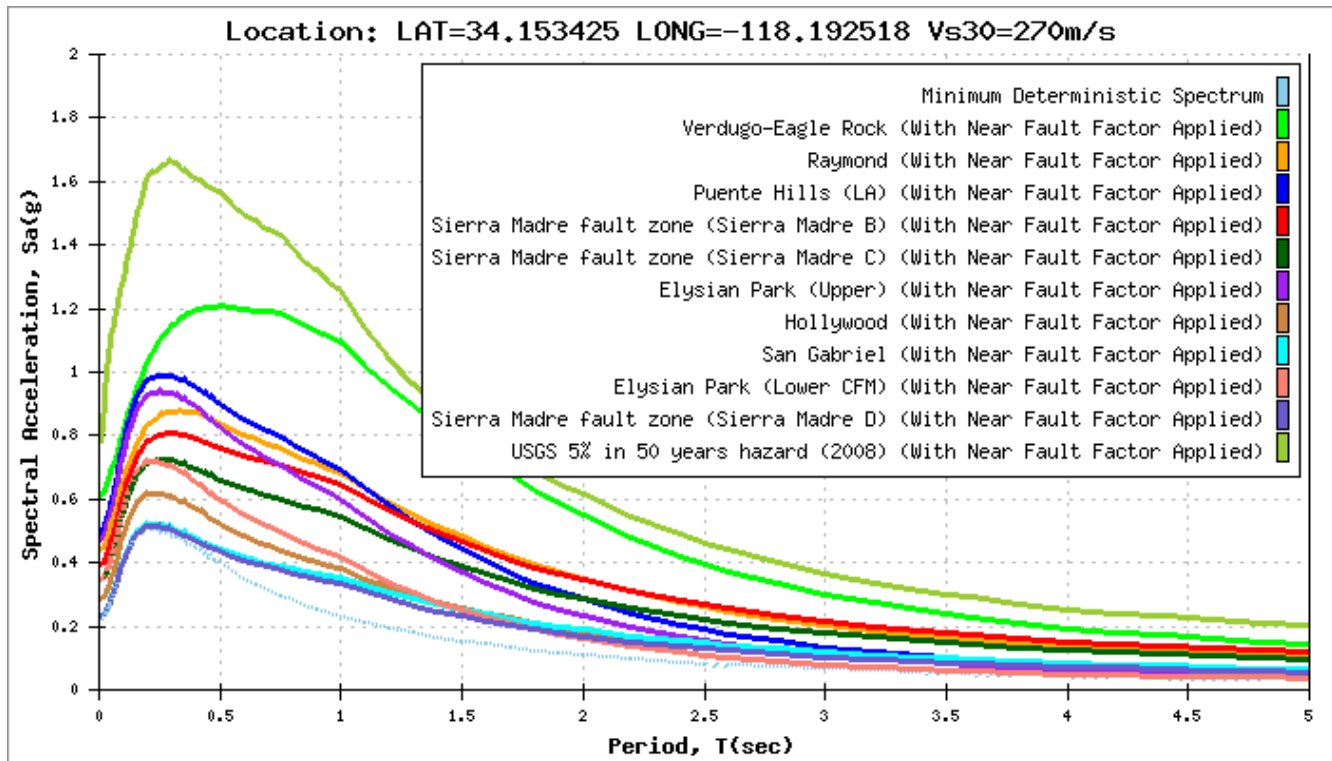
A waiver has never been revoked, but California officials have been on guard for any attempts since Scott Pruitt, Trump's choice to lead the EPA, [questioned the state's authority](#) during his confirmation hearing.

On Monday, the California Air Resources Board urged the court to reject the request to put off the hearing.

"A delayed decision in this case leaves a cloud of uncertainty over California's efforts," the state's filing said.

The case could provide hints as to how the Trump administration will handle a much bigger issue: California's waiver authority.

The state is [moving forward with tougher rules](#) on greenhouse gas emissions from tailpipes even though federal officials are preparing to roll back national standards.



99-38

Adding Southern San Andreas would flatten out the curve from 3 seconds out to 10 seconds  
 path effects must be considered  
 Vertical must also be considered  
 directivity must be considered  
 (Whittier extension of Bullard and Lettis points toward the project.  
 Near fault effects

## Analytical and numerical investigation of site response due to vertical ground motion

Han, Bo & Zdravković, L & Kontoe, Stavroula. (2017). Analytical and numerical investigation of site response due to vertical ground motion. *Géotechnique*. 1-14. 10.1680/jgeot.15.P.191.

“Abstract

Due to the repeatedly observed strong vertical ground motions and compressional damage of engineering structures in recent earthquakes, the multi-directional site response analysis is increasingly critical for the seismic design of important structures,

99-39

**Analytical and numerical investigation of site response due to vertical ground motion (PDF Download Available).** Available from:

[https://www.researchgate.net/publication/320179456\\_Analytical\\_and\\_numerical\\_investigation\\_of\\_site\\_response\\_due\\_to\\_vertical\\_ground\\_motion](https://www.researchgate.net/publication/320179456_Analytical_and_numerical_investigation_of_site_response_due_to_vertical_ground_motion)

may have some late references

**Apply Near Fault Adjustment To:**

NOTE: Caltrans SDC requires application of a Near Fault Adjustment factor for sites less than 25 km (Rrup) from the causative fault.

☐ Deterministic Spectrum Using

0.29	Km Verdugo-Eagle Rock
3.58	Km Raymond
10.2	Km Puente Hills (LA)
5.63	Km Sierra Madre fault zone (Sierra Madre B)
7.92	Km Sierra Madre fault zone (Sierra Madre C)
9.43	Km Elysian Park (Upper)
8.35	Km Hollywood
14.9	Km San Gabriel
15.0	Km Elysian Park (Lower CFM)
16.3	Km Sierra Madre fault zone (Sierra Madre D)

☐ Probabilistic Spectrum Using

0.29	Km (Recommend Performing Deaggregation To Verify)
------	---

Table 3.6-1 Distance of Faults to Project Site and Maximum Magnitudes

Fault Distance\* (miles) Maximum Moment Magnitude\*

Verdugo	0.3	6.9
Raymond	2.3	6.8
Hollywood	3.3	6.7
Sierra Madre (connected)	3.9	7.2
Upper Elysian Park Thrust	6.1	6.7
Santa Monica	6.2	7.4
Sierra Madre (San Fernando)	10.5	6.7
Clamshell-Sawpit	11.1	6.7
Puente Hills (LA Basin)	11.5	7.0
San Gabriel	12.4	7.3
Whittier-Elsinore	13.7	7.8
Newport-Inglewood (LA Basin)	13.7	7.5
Santa Monica	13.9	7.3
Elysian Park Lower		
Northridge	15.2	6.9
Puente Hills (Santa Fe Springs)	17.3	6.7
San Jose	19.6	6.7
Puente Hills (Coyote Hills)	19.9	
Compton-Los Alimitos		

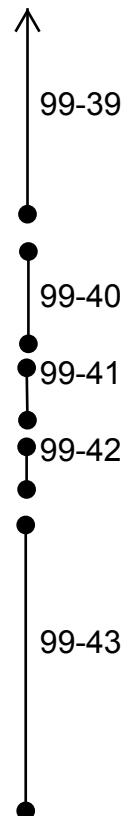
Malibu Coast 21.0 6.7  
 Anacapa-Dume 22.7 7.2  
 Palos Verdes 24.4 7.7  
 San Andreas San Bernadino Area (energy on South side of San Gabriel Mountains toward Glendale)  
 San Andreas Mojave-Palmdale (San Gabriel Mountains shelter Glendale)

note that km and miles do not exactly agree- you figure it out  
 IMHO CalTrans is measuring to the tangent of the fault plane and CGS measures to an arbitrary point

In addition UCERF3 utilizes multiple fault breaks (which increases large events and decreases mid size events)

Multi-segment events must be considered for essential services structures

Raymond-Hollywood-Santa Monica-Malibu Coast  
 Whittier Fault Extension-Whittier-Elsinore some say 7.85  
 Newport-Inglewood-Rose Canyon  
 Puente Hills thrust all 3 segments  
 Sierra Madre multiple segments (incl Sylmar etc)  
 San Andreas Southern to 1857 rupture  
 Verdugo- names change but fault is the same



From: [Marguerita Drew](#)  
 To: [Joe. Dennis](#)  
 Subject: Development of Scholl Canyon Landfill Site  
 Date: Thursday, November 02, 2017 8:59:53 PM

November 2, 2017

Mr. Dennis Joe  
 Case Planner, Planning Division Office  
 Community Development Department  
 Glendale Water and Power  
 141 N. Glendale Avenue  
 Glendale, CA 91206

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

I am writing this letter to urge you NOT to approve the construction of a power generator on the site of the Scholl Canyon Landfill. As a resident of Glendale, and Glenoaks Canyon, in particular, I am begging you to consider the dangers and ramifications of this proposal.

My neighbors and I are concerned about the following:

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester

100-1  
100-2  
100-3  
100-4  
100-5  
100-6  
100-7  
100-8  
↓



facility, and the landfill expansion.

With all of these potential dangers, it is irresponsible for the city to continue forward with this proposal.

Please put the residents of Glendale – and their health and safety – above profit and untested development by closing the landfill and vetoing the construction of any power plant, generator, or anaerobic digester facility in its place.

Thank you for your immediate attention to this matter.

Sincerely,

Marguerita Drew  
2321 Hollister Terrace  
Glendale, CA 91776

↑ 100-8  
●  
● 100-9  
●  
● 100-10  
●

November 2, 2017

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Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

**Re: Submission of Public Comment for Biogas Renewable Generation Project MND**

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

**Air Quality**

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

**Hazards**

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,00 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

**Geology**

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

**Cumulative Impacts**

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,



Melodie Khanjian  
341 Edwards Pl. 91206

101-1  
101-2  
101-3  
101-4  
101-5  
101-6  
101-7

**From:** Burt Culver <ballast@gmail.com>  
**Sent:** Friday, November 03, 2017 10:14 PM  
**To:** Krause, Erik; Joe, Dennis  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Public Comments for Grayson EIR and Biogas project 3

Public comments on Biogas Renewable Project and Grayson Expansion/Repowering

I am concerned about the Biogas Renewable Project and the Grayson Expansion project. The biogas from Scholl Canyon Landfill is currently being burned at Grayson. 102-1

There are many alternatives to the turbines proposed for burning the landfill gas. 102-2

One way of handling the gas would be to use the landfill gas in fuel cells to convert the gas into electricity. The pollution from the fuel cells is far, far lower than burning through turbines. Here is an analysis of a biogas fuel cell that LADWP tested a few years ago: <https://www.osti.gov/scitech/servlets/purl/827541> : 102-3

#### Emissions

Measures to improve the air quality in the city of Los Angeles Are very important to LADWP. By installing a 200 kW phosphoric acid fuel cell (PAFC), LADWP is reducing the amount of harmful air pollutants in the air such as NO<sub>x</sub> or SO<sub>x</sub>. Compared with traditional combustion power plants, PAFC's eliminate 40,000 pounds of acid rain and smog-causing emissions from the environment every year. From this table, it can be seen that the amount of NO<sub>x</sub> produced is negligible along with the other harmful emissions, thus confirming the use of fuel cell technology as a virtually pollution free source of energy.

Emissions	Main St FC Emissions (15% O <sub>2</sub> )
NO <sub>x</sub>	1ppm
SO <sub>x</sub>	Negligible
NO <sub>2</sub>	Negligible
SO <sub>2</sub>	2 ppmv
CO	5 ppmv
Particulates	Negligible
Smoke	None
Hydrocarbons	6ppm

Other biogas fuel cells are:

ES5 Energy Server: <http://www.bloomenergy.com/fuel-cell/es5-data-sheet/>

NO <sub>x</sub>	< 0.01 lbs/MWh
SO <sub>x</sub>	Negligible
CO	<0.05 lbs/MWh
VOCs	< 0.02 lbs/MWh

Or larger scale fuel cell plants like this one can scale up to 100MW - and could be used in the Grayson Project with regular natural gas:

<https://www.fuelcellenergy.com/blog-medium-2/markets/>

	FuelCell Energy	Combined Cycle gas plant
Size	1.4 MW to 100 MW	400+ MW <i>(scale req'd for high efficiency)</i>
Construction/Siting	Months; site WITHIN Urban Areas	Years; site AWAY FROM Urban Areas
Electrical Efficiency	Plant efficiency: 47-60% Transmission losses: <i>None!</i> Delivered efficiency: 47-60%	Plant efficiency: 55-60% Transmission losses: <i>(6-9%)</i> Delivered efficiency: 46-54%
Criteria Pollutants (NO <sub>x</sub> , SO <sub>2</sub> , PM)	No	Yes
Renewable Fuel Option / REC's	Yes	No
Combined Heat & Power	Yes	Limited
Scalable	Yes	No
Supports Urban Redevelopment	Yes	No
Affordable Carbon Capture	Yes	No

Their SureSource power plants are California Air Resources Board certified and can be placed in any urban setting because they are so clean. <http://investor.fce.com/press-releases/press-release-details/2017/FuelCell-Energy-SureSource-Power-Plant-Using-On-Site-Anaerobic-Digester-Gas-Achieves-Certification-for-California-Air-Resources-Board-Distributed-Generation-DG-Clean-Air-Standards/default.aspx>

Another option is that Glendale should look seriously at systems that convert landfill gas into liquid or compressed gas for fueling vehicles. Here's a description of such a system <https://inhabitat.com/california-company-launches-a-car-fuel-made-from-landfill-methane/> by this company: <http://redeem.cleanenergyfuels.com/>. Redeem fuel is sold at the city filling station at 1761 Gardena Ave Glendale, CA 91204 - we should ask if Clean Energy Fuels would take the biogas from Scholl for Redeem fuel. The conversion from gas to liquid could be done at Grayson or at Scholl and the gas could be used to fuel the CNG buses or other vehicles in the Glendale fleet.

Here is another company that does similar biogas-to-fuel systems: <https://www.airliquide.com/science-new-energies/biogas-bio-ngv>

A second subject is the contaminants in the landfill gas. If the landfill gas is to be burned it should be filtered for contaminants before burning. The contaminants should be dealt with safely without burning.

From <http://www.energyjustice.net/lfg>: "non-methane organic compounds" or NMOCs usually make up less than 1% of landfill gas. EPA identifies 94 NMOCs in their 1991 report, "Air Emissions from Municipal Solid Waste Landfills - Background Information for Proposed Standards and Guidelines." Many of these are toxic chemicals like benzene, toluene, chloroform, vinyl chloride, carbon tetrachloride, and 1,1,1 trichloroethane. At least 41 of these are halogenated compounds. Many others are non-halogenated toxic chemicals. More exhaustive tests for contaminants in landfill gas have found hundreds of different NMOC contaminants.

When halogenated chemicals (chemicals containing halogens - typically chlorine, fluorine, or bromine) are combusted in the presence of hydrocarbons, they can recombine into highly toxic compounds such as dioxins and furans, the most

toxic chemicals ever studied. Burning at high temperatures doesn't solve the problem as dioxins are formed at low temperatures and can be formed as the gases are cooling down after the combustion process."

Dioxins are not mentioned in the Draft Initial Study/Mitigated Negative Declaration or the Draft EIR.

Additionally, the DISMND shows a half pound of mercury to be released into the air per year which is very concerning. I ask that the biogas be cleaned prior to burning. Putting those compounds into our air basin when cleaning it is technically feasible is irresponsible.

Burt Culver  
Glendale, CA

↑  
102-5  
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102-6  
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102-7  
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102-8  
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**From:** [Michelle Gunn](#)  
**To:** [Joe. Dennis](#)  
**Subject:** Grayson Expansion Project  
**Date:** Friday, November 03, 2017 12:07:17 PM

---

Dear Mr. Joe,

As a parent of two children I am deeply concerned about the planned Grayson expansion project at Scholl Canyon. The pollution caused by such an expansion could have harmful negative impacts on our children for years to come.

Please, at the very least, offer informational meetings for residents in the surrounding neighborhoods so we can have our voices heard and questions answered.

Thank you for your consideration.

Best,  
Michelle Gunn

103-1

103-2



**From:** Burt Culver <ballast@gmail.com>  
**Sent:** Sunday, November 05, 2017 12:02 AM  
**To:** Krause, Erik; Joe, Dennis  
**Cc:** Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara  
**Subject:** Public Comments for Grayson EIR and Biogas project 4

Public comments on Biogas Renewable Project and Grayson Expansion/Repowering

I am concerned about the Biogas Renewable Project and the Grayson Expansion project. The biogas from Scholl Canyon Landfill is currently being burned at Grayson.

These projects are being considered separately, but in the DEIR for Grayson the change of burning biogas at the landfill is considered in section 6.1.3 Precedent-Setting Action. If these are separate projects why is this brought up here?

#### "6.1.3 Precedent-Setting Action

Changes from the Project that could be precedent setting are few. The most notable precedent setting actions are the adoption of **potentially utilizing biogas in an urban setting, which involves combusting and producing electricity at the landfill site**, thereby gaining the ability to remove the approximately five-mile pipeline between the landfill and the Project site. Such a decommissioning could set a precedent for other cities to do the same.

Other potentially precedent setting actions of the Project is the contribution the Project would make toward the City of Glendale's effort to meet the State's Renewable Energy Standard Mandate. Successful implementation of the Project would serve as an example to other cities and power plants within the State of California to follow in its footsteps."

104-1

Also in 6.2 the Grayson project is describes as using natural gas and biogas

#### "6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would be caused by implementing a project. Power plants, by their nature, consume limited, slowly renewable, and non-renewable resources. This consumption occurs during the construction phase, and continues throughout the operational lifetime. Project operation would require: the consumption of **natural gas and biogas** for the purpose of power generation, building material, fuel and operational materials and resources, and the transportation of goods and people to and from the Project site."

Also in 6.2.1 where it says the Project includes biogas:

"While the proposed repowering of the Grayson Power Plant is considered necessary to meet current and future City energy needs and California Renewables Portfolio Standard requirements, the Project represents a commitment to nonrenewable resources over the long term. Pursuant with Senate Bill 350, the Renewables Portfolio Standard requires retail sellers and publicly owned utilities including the Glendale Department of Water and Power to procure at least 50 percent of their electricity through renewable energy by 2030. The City currently serves its power system through a combination of renewable energy sources (both local and imports), non-renewable imports, and local generation. While the **Project does include more efficient use of biogas**, and the City's commitment to SB 350, natural gas is still the main source of electrical generation at the Project site."

Then in 3.0 Project Description it is said that the landfill gas will no longer be burned at Grayson and will be burned off-site but the pollution of that burning is not accounted for. Since the emissions of the biogas are counted in Grayson's current emission profile, if the biogas is burned elsewhere then Grayson should not be able to use that emission profile as its base emission profile.

104-2

"Landfill gas generated at Scholl Canyon is currently being combusted in Grayson's Units 3, 4, and 5 boilers. This landfill gas would no longer be transported to Grayson, and the pipeline would be decommissioned as part of the City's proposed Biogas Renewable Generation Project at Scholl Canyon. Instead, landfill gas is proposed to be used to generate electricity at Scholl Canyon in a proposed 12 MW Biogas Renewable Generation Project or it would be flared off."

In 3.1.2 Site Demolition the biogas project is mentioned. It's clearly intertwined with this project (see previous comment where closely related projects should be considered together under one EIR).

"In addition, the existing 8-inch landfill gas pipeline running from Scholl Canyon Landfill to the Grayson Power Plant would be capped at the Scholl Canyon Landfill property line and decommissioning is proposed as part of the proposed Biogas Renewable Generation Project located at the Scholl Canyon Landfill."

In this chart, it's clear that they are aware of moving the biogas burning to another location as they account for it in the GHG Emissions. That makes the biogas project a phase of this project.

Also, note the paragraph below the chart it says that "the net increase of GHG emissions from the operation of the Project exceeds the significance threshold of 10,000 metric tons per year". Then they go on to say how they will mitigate it but then right below this they determine "Level of Significance before Mitigation: Less than Significant Impact". That determination does not seem correct.

**Table 4-37 Net Increase of GHG Emissions from the Operation**

Device/Activity	CO <sub>2</sub> (MT/year)	CH <sub>4</sub> (MT/year)	N <sub>2</sub> O (MT/year)	Total CO <sub>2</sub> e (MT/year)
SCC-800 Combined Cycle Unit 10	185,722	3.5	0.35	185,914
SCC-800 Combined Cycle Unit 11	185,722	3.5	0.35	185,914
TRENT60 Simple Cycle Unit 12	52,047	0.98	0.10	52,100
TRENT60 Simple Cycle Unit 13	52,047	0.98	0.10	52,100
Emergency Engine	12.30	0.0002	0.00002	12
SF6 releases (Fairmont Switchyard)	0	0	0	96
Facility Occupants (Operational)	213.38	0.52	0.01	270
<b>Total GHG Emissions:</b>				<b>476,406</b>
<b>Total Baseline GHG Emissions (excluding GHG emission from landfill gas combustion):</b>				<b>60,574</b>
<b>Net Increase of GHG Emissions:</b>				<b>415,832</b>
Note: Once the Boilers 3, 4, and 5 are dismantled, the landfill gas will be combusted in Biogas Renewable Project. The GHG emissions from the landfill gas combustion will be counted toward the baseline GHG emissions for the Biogas Renewable Project, which consist of construction new power generation facility at the Scholl Canyon Landfill.				

As shown in Table 4-37, the net increase of GHG emissions from the operation of the Project exceeds the significance threshold of 10,000 metric tons per year. The GHG emissions exceedance is solely contributed from operating the proposed combustion turbines and transformers. However, the Project is required comply with the State cap and trade program by reporting CO<sub>2</sub>e emissions from the Grayson Power Plant and acquiring allowances and offset credits to mitigate 100 percent of GHG emissions from the combustion equipment and transformers. Net emissions after mitigation will include only emissions related to facility occupants and will be well below the 10,000-metric ton significance threshold.

#### **Level of Significance before Mitigation:**

Less than Significant Impact

Related to the above table is the calculation of the baseline for other pollutants. For GHG, they subtracted the biogas GHG and then formed a baseline for calculating new GHG emissions of the new plant but they did not do this for the significant other pollutants from the project. If the biogas emissions were removed from the old plant baseline then the new plant would exceed the significance thresholds on CO, PM10, and PM2.5.

104-6

#### 4.3.32: "Replaced Power Generating Equipment

The Project will include the demolition of three boilers (Units 3, 4, and 5) and three turbines (Units 8A, 8B, and 8C). The emissions from these replaced units were calculated based on the average of 2015 and 2016 SCAQMD Annual Emission Report, the adjustment to current Best Available Control Technology emission standards, and actual annual operating days in accordance with SCAQMD Rule 1306(c). Table 4-25 summarizes the daily average emissions of these replaced units. Appendix D.2 includes more detailed information of the emission inventory.

To evaluate the air quality impacts of the Project, maximum daily emissions from the new equipment were compared with the significance daily thresholds for operations. Since the Project includes the demolition of existing emission sources (three boilers and three combined cycle turbines), emissions from these replaced equipment was calculated as an emission baseline. The emissions from these replaced units were calculated based on the average of 2015 and 2016 SCAQMD Annual Emission Report, the adjustment to current Best Available Control Technology emission standards, and actual annual operating days in accordance with SCAQMD Rule 1306(c).

104-7

Table 4-25 Average Daily Emissions of Replaced Equipment

Pollutant	Boiler 3 (lbs./day)	Boiler 4 (lbs./day)	Boiler 5 (lbs./day)	Gas Turbine 8A (lbs./day)	Gas Turbine 8BC (lbs./day)
NO <sub>x</sub>	12	21	54	8	7
CO	62	114	314	4	3
VOC	12	21	52	3	2
PM10	22	38	93	5	4
PM2.5	22	38	93	5	4
SO <sub>x</sub>	4	6	14	1	1

Table 4-26 Project Maximum Net Daily Emissions

Pollutant	NO <sub>x</sub> (lbs./day)	CO (lbs./day)	VOC (lbs./day)	PM10 (lbs./day)	PM2.5 (lbs./day)	SO <sub>x</sub> Lbs./day
New turbines (without maint.)	648	623	179	173	173	101
New Turbines (with maint.)	1,570	1,017	191	173	173	101
New Emergency Engine	6	3	0.19	0.01	0.01	0.01
New Cooling Towers	0	0	0	5.4	5.4	0
Facility Occupancy	0.58	1.45	0.69	0.40	0.12	0.006
Less: Replaced Equipment (actual historic)	102	497	90	162	162	26
<b>Net Increase (turbines without maint.)</b>	<b>553</b>	<b>130</b>	<b>90</b>	<b>16</b>	<b>16</b>	<b>75</b>
<b>Net Increase (turbines with maint.)</b>	<b>1,475</b>	<b>524</b>	<b>102</b>	<b>16</b>	<b>16</b>	<b>75</b>
Sig. Thresholds (Operation)	55	550	55	150	55	150
Exceed Thresholds	YES	NO	YES	NO	NO	NO
Exceed Thresholds after New Source Review Offsets	NO	N/A	NO	NO	N/A	NO
<b>Note:</b> <ol style="list-style-type: none"> <li>The net emissions increase does not reflect emission offsets that will be required pursuant to SCAQMD Rule 1302. With the retirement of emission offsets to offset any emission increase of NO<sub>x</sub>, VOC, PM10 and SO<sub>x</sub>; the net increase of all pollutants will be below the significance thresholds.</li> <li>CO and PM2.5 emissions are not required to be offset per SCAQMD Rule 1302 nor do they exceed the applicable SCAQMD daily mass emissions thresholds.</li> </ol>						

Table 4-27 Emission Reduction Credits Estimation

Pollutant	NO <sub>x</sub> 30-Day Avg. (lbs./day)	VOC 30-Day Avg. (lbs./day)	PM10 30-Day Avg. (lbs./day)	SO <sub>x</sub> 30-Day Avg. (lbs./day)
Emissions for New Turbines	395	84	90	57
Less Emissions from Replaced Equipment	102	89	162	25
Total ERC requirements (After 1.2:1 Offset Ratio)	154 – 252	0 – 41	0 – 44	0 - 29

Here they are using the historical emissions of the plant to determine the significance of the emissions of the new plant but again they include the biogas emissions. To be honest, they should stop burning the biogas at Grayson and use those numbers as the baseline. This is a significant reason for them to do these projects together rather than do the biogas project a few years before Grayson - there is no way they could justify the pollution from the new plant if they removed the biogas pollution from Grayson's baseline.



Table 4-28 PSD Annual Emissions for Prevention of Significant Deterioration Determination

Equipment	NO <sub>2</sub> (tons/year)	CO (tons/year)	PM <sub>10</sub> (tons/year)	SO <sub>2</sub> (tons/year)
<b>Potential Emissions from New Units</b>				
SCC-800 Unit 10	13.92	7.89	5.23	3.55
SCC-800 Unit 11	13.92	7.89	5.23	3.55
TRENT60 Unit 12	11.77	10.87	1.83	0.86
TRENT60 Unit 13	11.77	10.87	1.83	0.86
Cooling Tower (North)	0	0	0.49	0
Cooling Tower (South)	0	0	0.49	0
Emergency Engine	0.15	0.09	0.0003	0.0002
<b>Total Emissions of New Units:</b>	<b>51.53</b>	<b>37.61</b>	<b>15.1</b>	<b>8.82</b>
<b>Historic Actual Emissions from Existing Units to be Replaced</b>				
Boiler 3	3.61	5.53	1.87	0.3
Boiler 4	6.76	12.77	4.01	0.64
Boiler 5	15.92	29.2	8.04	1.23
Gas Turbine 8A	2.13	9.07	0.97	0.04
Gas Turbine 8BC	1.46	10.42	0.5	0.02
<b>Less: Total Emissions of Replaced Units:</b>	<b>29.88</b>	<b>66.99</b>	<b>15.39</b>	<b>2.23</b>
<b>Net Emissions Increase:</b>	<b>21.65</b>	<b>(29.38)</b>	<b>(0.29)</b>	<b>6.59</b>
Note: 1. The emissions of replaced units were calculated based on the average emissions reported in SCAQMD Annual Emission Report for 2015 and 2016.				

Here is a chart without the biogas burners (boilers 3,4,5) in the baseline:

Equipment	NO <sub>2</sub> (tons/year)	CO (tons/year)	PM <sub>10</sub> (tons/year)	SO <sub>2</sub> (tons/year)
<b>Potential Emissions from New Units</b>				
SCC-800 Unit 10	13.92	7.89	5.23	3.55
SCC-800 Unit 11	13.92	7.89	5.23	3.55
TRENT60 Unit 12	11.77	10.87	1.83	0.86
TRENT60 Unit 13	11.77	10.87	1.83	0.86
Cooling Tower (North)	0.00	0.00	0.49	0.00
Cooling Tower (South)	0.00	0.00	0.49	0.00
Emergency Engine	0.15	0.09	0.00	0.00
<b>Total Emissions of New Units:</b>	<b>51.53</b>	<b>37.61</b>	<b>15.10</b>	<b>8.82</b>
<b>Historic Actual Emissions from Existing Units to be Replaced</b>				
Boiler 3	0.00	0.00	0.00	0.00
Boiler 4	0.00	0.00	0.00	0.00
Boiler 5	0.00	0.00	0.00	0.00
Gas Turbine 8A	2.13	9.07	0.97	0.04
Gas Turbine 8BC	1.46	10.42	0.50	0.02
<b>Less: Total Emissions of Replaced Units:</b>	<b>3.59</b>	<b>19.49</b>	<b>1.47</b>	<b>0.06</b>
<b>Net Emissions Increase:</b>	<b>47.94</b>	<b>18.12</b>	<b>13.63</b>	<b>8.76</b>

The cumulative impact of Grayson and the biogas project are considered in 4.11.4 Air Quality Cumulative Impacts but dismissed without analysis as "not expected to have a cumulative impact". These projects should be considered together so that we can find out what the cumulative impact is:

"The Biogas Renewable Generation Project, which consists of constructing a new power generation facility at Scholl Canyon Landfill, may be the closest project that can cause significant contribution to the ambient air quality and health risk. However, the project location is approximately six miles east of the Grayson power plant. Emissions from both projects are not expected to have cumulative impact toward ambient air quality standards and public health, given their distance from each other."

Moving the burning of biogas to Scholl Canyon is obviously a phase of the Grayson project and they should be considered together in one EIR.

I call on the City to pause the CEQA process for Grayson and the non-CEQA process for the Scholl Canyon Biogas plant and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

Regards,

Burt Culver  
Glendale

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104-8  
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104-9  
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**From:** [Krause, Erik](#)  
**To:** [Joe, Dennis](#)  
**Subject:** FW: Comments on Biogas Project  
**Date:** Wednesday, November 08, 2017 11:55:18 AM  
**Attachments:** [biogas comments update.doc](#)

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105

FYI

**Erik Krause, Deputy Director of Community Development • City of Glendale • Community Development Department**

633 E. Broadway, Room 103 • Glendale, CA 91206 • (818) 937-8156 • [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)



**From:** James Flournoy [mailto:[saveourcommunitysgv@gmail.com](mailto:saveourcommunitysgv@gmail.com)]  
**Sent:** Monday, November 06, 2017 9:09 AM  
**To:** Krause, Erik  
**Subject:** Re: Comments on Biogas Project

Update and Supplement to Comments on Negative Declaration for  
Glendale Biogas Renewable Generation Project

Scholl Canyon Landfill

Let's be clear- we are not opposed to a NEG DEC with adequate mitigation and enforceable conditions of approval

the 2006 NHMP is excellent- wish all city's had one as good- most are just cut and paste pabulum and are useless for real planning

does need an update- keep us informed if you update or General Plan

thanks for the opportunity to comment on your projects

btw some of owned property in Glendale near the train station for a hundred years- they care

On Thu, Nov 2, 2017 at 7:06 PM, James Flournoy <[saveourcommunitysgv@gmail.com](mailto:saveourcommunitysgv@gmail.com)> wrote:

Attached please find our comments on the Negative Declaration  
Biogas Comments  
and specific comments on  
Seismology

Dr Syndor was head of CGS "essential Services Structures, Schools, and Hospitals "review division

do not be misled by Schools and Hospitals in the title

Being from 2005 it is keyed to the UBC 1998-2002

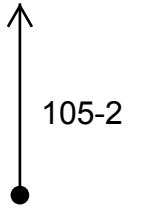
All guidelines must be updated to the latest CBC (now 2017) and the Latest ASCE 7-16  
FEMA NEHRP are good sources of commentaries to provide clarity- Latest is 2015

105-1

105-2

The hilltop location is going to take some additional work- we think that ECI who did your General Plan would be top of the list They did some seismology for us in the City of Rosemead and for out General Plan.

let us know how we can help



November 9, 2017

Save Our Community SGV  
c/o 8655 Landis View Lane  
Rosemead CA 91770

Erik Krause  
Interim Deputy Director of Community Development,  
City of Glendale Community Development Department Planning Division  
633 E. Broadway, Room 103 Glendale, California 91206  
[EKrause@glendaleca.gov](mailto:EKrause@glendaleca.gov)

Update and Supplement to Comments on Negative Declaration for  
Glendale Biogas Renewable Generation Project  
Scholl Canyon Landfill  
7721 N Figueroa St, Eagle Rock  
Los Angeles Ca 90041

Let's be clear- we are not opposed to a NEG DEC with adequate mitigation and enforceable conditions of approval

In regards to USGS "ARKSTORM here is a quote  
may apply more to the Power Plant but to Glendale in General for Planning

"On Christmas Eve 1861, rainfall started that hardly let up for several weeks up through most of January 1862. As this was roughly a 40-day period, the resulting inundation was called "Noah's Flood," and many cattle, crops, and some structures were washed away. Much of southern Los Angeles County became an inland sea, as was a significant part of the San Joaquin Valley. A short notice in the *Los Angeles Star* newspaper in January observed that, with their adobe home flooded, the Temples "effected their escape from the house on a raft." In hindsight, it's amazing the building survived for as long as it did, because the area is now a restricted floodplain controlled by the U.S. Army Corps of Engineers, which built the Whittier Narrows Dam, just a short distance south of the adobe. "

<http://misionvieja.blogspot.com/2014/05/the-temple-family-of-mision-vieja.html> 2014  
Hydrology

<https://sf.curbed.com/2017/1/12/14256474/arkstorm-california-weather-storm-flood>

<https://www.theverge.com/2017/2/21/14684630/california-atmospheric-river-flood-storm-evacuations-rain-arkstorm>

<https://wattsupwiththat.com/2017/02/17/californias-past-mega-floods-and-the-coming-arkstorm/>

<https://www.scientificamerican.com/article/atmospheric-rivers-california-mega-flood-lessons-from-forgotten-catastrophe/>

105-3

105-4

Nearby faults and hill effects

[http://www.ci.glendale.ca.us/pdf/HMP/HMP\\_Sec-6\\_Earthquakes.pdf](http://www.ci.glendale.ca.us/pdf/HMP/HMP_Sec-6_Earthquakes.pdf)

Natural Hazards Mitigation Plan City of Glendale, California Section 6 – Earthquakes 2006

is EXCELLENT but needs an update to current CBC and ASCE7-16 and NEHRP 2015

Verdugo fault connects to other faults to East and West

NHMP P6-26 The Verdugo fault strikes southeasterly across the southern edge of the Verdugo Mountains, through the central portion of Glendale, and across the foot of the San Rafael Hills, where it seems to merge with the Eagle Rock fault. 105-5

NHMP P28 To the west, the Eagle Rock fault lies on trend with the Verdugo fault, although in the subsurface, based on gravity data, Weber (1980) suggests that there may be a step or bend between the two fault zones. Although very little is known about the Eagle Rock fault, given that it appears to be related to active faults in the area, such as the Verdugo fault, it should be considered potentially active, subject to further study. For example, although the Eagle Rock fault may not be capable of generating an earthquake, it may break co-seismically with movement on the Verdugo fault.

Anything new on this?

A fault hazard management zone that includes the inferred trace of the fault as mapped by Dibblee (1991), but is wider to the north, to include the break in slope and the zone of faulting mapped by Byer (1968) is proposed. WAS THIS EVER DONE? 105-6

Multiple Segment events must be considered

Verdugo et all

(Hollywood-Raymond-Santa Monica & York blvd?) lots of work on these faults last 10 years

Sierra Madre NHMP pg 25

Terrashake was published in 2005 and your NHMP does not address the big Gorilla in the Room-the Southern San Andreas directed toward Glendale through a chain of basins along the San Gabriel mountains front. Shakeout was written ca 10 years ago- there is much new work since then maximum rotated energy versus average of x and y ( $x+y/2$ ) 105-7

Ridgetop fissuring and Shattering page NHMP 6-31

“above ground storage tanks, reservoirs and utility towers are often located on top of ridges, and during strong ground shaking, these can fail or topple over, with the potential to cause widespread damage to development downslope (storage tanks and reservoirs), or disruptions to the lifeline systems (utility towers). “ 105-8

Transformers, Switching and ground motion.

Bakersfield 1952 7.3 on the [moment magnitude scale](#). Kate Hutton says 7.5 Mm Strike slip White Wolf fault ... energy of the event was 100 times that of the [1933 Long Beach earthquake](#).

Precarious Rock and Overturned Transformer Evidence for Ground Shaking in the Ms 7.7 Kern County Earthquake: An Analog for Disastrous Shaking from a Major Thrust Fault in the Los Angeles Basin Bulletin of the Seismological Society of America, Vol. 94, No. 6, pp. 1993–2003, December 2004 105-9

“... ground motion on the footwall give peak accelerations considerably lower than predicted by standard regression curves.

On the other hand, on the hanging-wall, there is evidence of intense ground shattering and lack of precarious rocks, consistent with the intense hanging-wall accelerations

We'll call this the “*Hound of the Baskervilles*” effect

“There is clear evidence of the effects of rupture directivity in ground motions on the hanging-wall side of the fault “

Overtaken and damaged transformers indicate significant transfer of energy from the hanging wall to the footwall,

Hanging Wall vs Footwall is a critical analysis which must be accomplished

Compare with local faults, near fault effects

<https://books.google.com/books?id=73M6aqqy-uUC&pg=PA2553&lpg=PA2553&dq=Bakersfield+earthquake+%26+transformers&source=bl&ots=Da576MujV&sig=0TUZCj4AY5d6OnmziZlEXY3yBEY&hl=en&sa=X&ved=0ahUKEwibgtrBoqrXAhUUHWMKHgGeD5UQ6AEIXjAL#v=onepage&q=Bakersfield%20earthquake%20%26%20transformers&f=false>

**Lees' Loss Prevention in the Process Industries: Hazard Identification page 2553 July 21, 1952 butane storage spheres 7.7 Richter Scale 12 miles away 1 foot horizontal and .5 ft vertical, foundation bolts stretched 1.5”**

Offset rows of cotton were documented at a number of locations along the northeast trending fault breaks in the valley. An offset of 3 ft (0.91 m) was seen 17 miles (27 km) south of Bakersfield, about .5 mi (0.80 km) east of [California State Route 99](#), and 3 miles (4.8 km) southwest of Arvin a north–south oriented row was offset with movement towards the west on the south side of the shift. At the same location, an east–west road was dislocated towards the northeast a minimum of 5 ft (1.5 m), and near the mouth of Comanche Creek (6 miles (9.7 km) south of Arvin) a shallow-sloped fault scarp was raised with a maximum vertical displacement of about 3 ft (0.91 m) [https://en.wikipedia.org/wiki/1952\\_Kern\\_County\\_earthquake](https://en.wikipedia.org/wiki/1952_Kern_County_earthquake)

## Hazards for Planning

from Shakeout Plan for your Natural Gas Supply in a Disaster, Mitigation Required

**Oil and Gas Pipelines**—Major petroleum and natural gas pipelines also cross the ShakeOut Scenario rupture zone through the major lifeline corridors at 39 locations. Displacements range from 2 cm to 8.26 meters, with the largest displacement occurring near the Salton Sea (fig. 3-22; Appendix D, Table 5). In general, pipelines can best withstand fault displacements when deformation places the pipeline in tension rather than compression or shear. Based on their orientations relative to the fault zone, pipelines in the Palmdale, San Geronio Pass, and Coachella Valley areas would likely undergo both shearing and tension, whereas in the Cajon Pass region, most pipelines would likely experience both shearing and compression as a result of the ShakeOut earthquake.

p94

. Electric power is lost throughout the study area immediately, and it is restored to 90% of those capable of receiving it within 3 days.

What can be done to minimize this in Glendale?

### Electric Power

Los Angeles, San Bernardino, and Riverside Counties immediately lose all electric power.

Gas pipeline damage reduces the ability to produce power within the affected areas of those counties

Expert-Recommended Mitigation • Very few low-voltage (below 115 kV) transformers are secured.

Anchoring these transformers is the Number 1 mitigation measure. •

Replace more of the breakable ceramic insulators with polymer insulators.

Pipeline damage causes the loss of piped drinking water in much of the most strongly shaken areas (with MMI VIII+ shaking) for a week or more.

Telecommunications are severely impacted as a result of heightened demand after the earthquake, and to a limited extent because of damage to telephone switching facilities and fiber-optic cables.

**Loss of commercial electric power**—This impacts cell service. Cell sites have backup power adequate for about three hours. A loss of commercial electric power therefore causes a loss of cell service from about three hours after the earthquake until power is restored or an emergency generator is brought to the cell site (often within one day). Lack of enough fuel, lack of power to fuel suppliers

Can Emergency Power from the Project be supplied to Critical Infrastructure?

### Hospitals p122 structural and non structural

Emergency power was intermittently lost due to equipment failures.

“Of hospital buildings in Los Angeles, Orange, Riverside, and San Bernardino Counties, it is posited for ShakeOut Scenario planning purposes that over 60% of the buildings are nonfunctional and suffer irreparable damage.”

“Emergency power was lost in portions of the facility due to circuit breakers opening automatically after water caused electrical grounds “



**From:** [Randall Wise](#)  
**To:** [Krause, Erik](#); [Joe, Dennis](#)  
**Cc:** [Gharpetian, Vartan](#); [Devine, Paula](#); [Agajanian, Vrej](#); [Sinanyan, Zareh](#); [Najarian, Ara](#)  
**Subject:** Public Comments for Grayson EIR and Biogas project 4  
**Date:** Monday, November 06, 2017 8:19:00 AM

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#### Public comments on Biogas Renewable Project and Grayson Expansion/Repowering

It looks like we have a problem with the DEIR for the Repowering of Grayson. Although the Repowering and the Biogas project are supposedly being evaluated separately the Biogas project is being used to off-set the emissions from the proposed Repowering project. We need to have a complete EIR that includes both projects so we can evaluate the overall impact of the projects.

This inclusion of the Biogas project in the Grayson EIR could certainly be challenged in court. I suggest that the re-evaluation should be done now.

Respectfully,

Randall Wise  
2105 Hollister Ter.  
Glendale, CA 91206

106-1

106-2

**Hermosa Beach Office**  
Phone: (310) 798-2400  
Fax: (310) 798-2402

**San Diego Office**  
Phone: (858) 999-0070  
Phone: (619) 940-4522



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**Amy Minter**  
Email Address:  
[acm@cbcearthlaw.com](mailto:acm@cbcearthlaw.com)

Direct Dial:  
310-798-2400 Ext. 3

November 7, 2017

*Via Email and U.S. Mail*

Dennis Joe  
Case Planner  
Glendale Planning Division  
633 E. Broadway, Room 103  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Re: Comments on Mitigated Negative Declaration for Biogas Renewable  
Generation Project

Dear Mr. Joe,

On behalf of the Glenoaks Canyon Homeowners Association (GOCHA), we provide these comments on the Mitigated Negative Declaration (MND) for the Biogas Renewable Generation Project ("Biogas Project"). These comments supplement the comment letter submitted by GOCHA on October 19, 2017. The Biogas Project would be developed on the Scholl Canyon Landfill site and would rely on methane from the landfill to generate power. Currently, the methane produced by the Scholl Canyon Landfill is processed at the Grayson Power Plant.

107-1

We reiterate that the approval of the Biogas Project would violate the California Environmental Quality Act (CEQA) because the proposed MND is inadequate and inaccurate; an environmental impact report (EIR) should have been prepared to analyze the potentially significant impacts associated with this Project. An EIR must be prepared instead of a MND when there is substantial evidence to support a fair argument that the project may have significant adverse environmental impacts. (Public Resources Code § 21151.) "The fair argument standard is a 'low threshold' test for requiring the preparation of an EIR." (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.) "If there is substantial evidence of a significant environmental

107-2

Biogas Project and the Grayson Repowering Project. The landfill gas from the Scholl Canyon Landfill is currently processed at the Grayson Power Plant. (The DEIR for Grayson Repowering Project is incorporated by reference and located at: <http://www.glendaleca.gov/home/showdocument?id=38818>.) The Biogas Project would take over the processing of this landfill gas, expanding the capacity of Grayson Power Plant for additional production requiring new powering sources.

107-2

The MND fails to analyze the cumulative impacts of the operation of both the Grayson Repowering Project and the Biogas Project. This failure is based on a faulty definition of cumulatively considerable impacts. The MND acknowledges that “PM10 and PM2.5 background ambient concentrations already exceed federal or state standards”, but discounts the possibility of a cumulative impact based on a claim that the Project level impacts do not exceed significance thresholds. (MND p. 3.3.24.) CEQA cases have repeatedly overruled such findings.

One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant, assuming threatening dimensions only when considered in light of the other sources with which they interact. Perhaps the best example is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem.

107-3

(*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720.) The MND’s failure to analyze the cumulative air quality impacts of the Biogas Project and Grayson Repowering Project must be rectified. As the particulate matter emissions are already at significantly adverse levels, the additional emissions that would result from the operation of these two projects would be a significant cumulative impact that must be analyzed in an EIR.

Thank you for your time and consideration in this matter. We look forward to the City promptly addressing this issue.

Sincerely,



Amy Minter

**From:** [Krause, Erik](#)  
**To:** [Joe, Dennis](#)  
**Subject:** FW: Comments on Biogas Project  
**Date:** Wednesday, November 08, 2017 5:29:56 PM  
**Attachments:** [Biogas Supplement 2.doc](#)

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FYI

**Erik Krause, Deputy Director of Community Development • City of Glendale • Community Development Department**

633 E. Broadway, Room 103 • Glendale, CA 91206 • (818) 937-8156 • [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)



**From:** James Flournoy [mailto:[saveourcommunitysgv@gmail.com](mailto:saveourcommunitysgv@gmail.com)]  
**Sent:** Wednesday, November 08, 2017 5:27 PM  
**To:** Krause, Erik  
**Subject:** Re: Comments on Biogas Project

2ed supplemental comments FYI

On Mon, Nov 6, 2017 at 9:09 AM, James Flournoy <[saveourcommunitysgv@gmail.com](mailto:saveourcommunitysgv@gmail.com)> wrote:

Update and Supplement to Comments on Negative Declaration for  
Glendale Biogas Renewable Generation Project

Scholl Canyon Landfill

Let's be clear- we are not opposed to a NEG DEC with adequate mitigation and enforceable conditions of approval

the 2006 NHMP is excellent- wish all city's had one as good- most are just cut and paste pabulum and are useless for real planning

does need an update- keep us informed if you update or General Plan

thanks for the opportunity to comment on your projects

btw some of owned property in Glendale near the train station for a hundred years- they care

On Thu, Nov 2, 2017 at 7:06 PM, James Flournoy <[saveourcommunitysgv@gmail.com](mailto:saveourcommunitysgv@gmail.com)> wrote:

Attached please find our comments on the Negative Declaration  
Biogas Comments  
and specific comments on  
Seismology

Dr Syndor was head of CGS "essential Services Structures, Schools, and Hospitals "review division

108-1

108-2

do not be misled by Schools and Hospitals in the title  
Being from 2005 it is keyed to the UBC 1998-2002  
All guidelines must be updated to the latest CBC (now 2017) and the Latest ASCE 7-16  
FEMA NEHRP are good sources of commentaries to provide clarity- Latest is 2015  
The hilltop location is going to take some additional work- we think that ECI who did your  
General Plan would be top of the list They did some seismology for us in the City of  
Rosemead and for our General Plan.

let us know how we can help



108-2

November 9, 2017

Save Our Community SGV  
c/o 8655 Landis View Lane  
Rosemead CA 91770

Erik Krause  
Interim Deputy Director of Community Development,  
City of Glendale Community Development Department Planning Division  
633 E. Broadway, Room 103 Glendale, California 91206  
[EKrause@glendaleca.gov](mailto:EKrause@glendaleca.gov)

Update and Supplement to  
Update and Supplement to Comments on Negative Declaration for  
Glendale Biogas Renewable Generation Project  
Scholl Canyon Landfill  
7721 N Figueroa St, Eagle Rock  
Los Angeles Ca 90041

The City of Montebello did a first attempt at addressing hillside amplification in their Montebello Hills Specific Plan Final EIR for their condo project on top of the active Montebello Oil field.

I GEOTECHNICAL INVESTIGATION AND REVIEW OF UPDATED CONCEPTUAL GRADING PLAN/ADDENDUM (NOT RECIRCULATED BUT APPENDIX I INCLUDES I-1 AND I-2)

I-2 is where Hillside is considered- our opinion on these two- garbage in- garbage out but a start

I-1, GEOTECHNICAL ADDENDUM TO UPDATE FAULTING AND SEISMICITY PORTION OF THE REFERENCED GEOTECHNICAL INVESTIGATION AND REVIEW OF UPDATED CONCEPTUAL GRADING PLAN

I-2, ADDENDUM GEOTECHNICAL UPDATE TO FAULTING AND SEISMICITY PORTION OF THE REFERENCED GEOTECHNICAL INVESTIGATION AND PRELIMINARY GRADING PLAN REVIEW FOR THE NORTHERLY AND SOUTHERLY WATER TANK SITES

<http://cityofmontebello.com/images/planning-community-development/2014-rdeir/2014-rdeir-vol4.zip>

These were never peer reviewed as required by the Seismic Hazards Mapping Act- SHMA attachment previously sent and is a related cause of action to a CEQA suit.

In Today's news the same corrupt council that approved the EIR and MHSP just got their heads handed to them on their sales tax increase- actually a vote of no confidence.

The developer wrote the DEIR as a glossy P.R. puff piece knowing the council would vote on anything without reading it.

"EZFRISK analysis considers the Elsinore and Whittier Faults as one continuous fault capable of producing earthquakes with a higher moment magnitude (7.85)."

EZFRISK got this one right – most on line sources don't  
but failed to do so for Puente Hills Thrust and omits San Andreas entirely  
It does not consider Source and Path Effects or headwall-footwall

108-3

108-4

Note the consultants did not use the then current CBC or ASCE 7 or latest NGA, etc

But this is the only attempt of taking a look at Hillside effects at this time we know of.

WE are not criticizing NMG, who we consider underfunded and put under unreasonable time constraints, but the developer and the City.

A peer review would have uncovered the shortcomings and NMG could have fixed them.

see I-2 Appendix A for references many are different than those previously sent

(best to analyze as if a base isolated structure and not rely on AWWA for tanks).

New Zealand, Japan, Taiwan and Europe all have better Tank standards

Note the EIR took a swipe at Tanks but did not revisit the 100 foot tall retaining wall...Which Army Corps now shows has a multi foot subsidence near it's East end location...

WE are really curious what a dynamic analysis would show for the mass behind the retaining wall acting on the wall given verified Sources and Paths and Site factors.

Cheers



SO has Glendale adopted ASCE 7-16?

If we are not mistaken CBC 2017 references ASCE 7-10 which is state of the art c.a. 1998

If you have not adopted ASCE 7-16 we suggest serious consideration of...

**INVESTIGATION OF AN IDENTIFIED SHORT-COMING IN THE SEISMIC  
DESIGN PROCEDURES OF ASCE 7-10  
AND  
DEVELOPMENT OF RECOMMENDED IMPROVEMENTS FOR ASCE 7-16**

Prepared for:

**Building Seismic Safety Council**

**National Institute of Building Sciences**

**Washington, D.C.**

**Kircher & Associates**

**Consulting Engineers**

**Palo Alto, California**

**March 15, 2015**

**INVESTIGATION OF AN IDENTIFIED SHORT-COMING IN THE SEISMIC DESIGN PROCEDURES OF  
ASCE 7-10**

**Chapters 1-4**

**then**

**DEVELOPMENT OF RECOMMENDED IMPROVEMENTS FOR ASCE 7-16 (mostly accomplished)**

**Chapters 5 & 6**

**6.4 Recommendations for Improving Future Editions of ASCE 7 ..... 6-24**

**Professor Jonathan Stewart of the University of California at Los Angeles can help you walk through the document.**

**Once you get current you will notice that ASCE 7-16 does not cover directivity or near fault effects or basin edge/ shape effects although it takes a shot with a basin factor.**

**The biggest thing it misses are PATH effects from the Seismic Source to the Site.**

**we commented on hillside and hilltop amplification, under Topographical effects which also is not covered**



JOSE HUIZAR  
COUNCILMEMBER, 14TH DISTRICT

November 8, 2017

Dennis Joe, Case Planner  
Community Development Department, Planning Division Office  
633 E. Broadway, Room 103  
Glendale, CA 91206  
via email at [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Mr Joe:

As representative of the City of Los Angeles Council District 14, which includes the community of Eagle Rock, I am submitting comments in response to the Mitigated Negative Declaration [MND] proposed by the Glendale Water and Power [GWP] for a Biogas Renewable Generation Project [proposed project].

109-1

It is with great frustration and disappointment that this letter is being sent without an adequate dialogue between our neighboring cities regarding the Scholl Canyon landfill [landfill, or SCLF], the operation of which continues to negatively impact the community of Eagle Rock. GWP has failed to redress these historic and ongoing impacts and failed to engage its neighbors regarding plans and potential environmental improvements at the facility. Instead, while asserting the continued possibility of an ill-conceived, flawed and controversial proposal to expand the landfill, GWP has chosen to propose an additional industrial facility at the site, complete with four 40' smoke stacks, 15-18 months of methane flaring during construction, unmitigated carbon monoxide emissions among other pollutants, hazardous materials in a fire-prone area, and the shifting of environmental impacts to Scholl Canyon from an existing facility five miles away. This proposal is being made without consideration of the interests of the community of Eagle Rock and the City of Los Angeles.

109-2

109-3

109-4

How is it possible that after our contentious dispute over the proposed expansion of the landfill GWP would propose a power plant at the site without informing the Council office or any of the organizations or individuals who had made comments on the expansion proposal? My office and others have asserted our standing as interested parties in the operations and future of Scholl Canyon, and it is unfortunate that GWP has actively sought to minimize the participation of interested parties in the proposed project and in its environmental review.

109-5

This concern is validated by the letter from the Los Angeles County Department of Public Works, dated Oct. 10, 2017, which notes that even the County had not been properly informed about the MND, despite being the owner of the land on which the facility is proposed and being a partner in the Joint Powers Authority that oversees the operation of the landfill.

109-6

GWP did provide a three-week addition to the comment period at my request. I appreciate this additional time. However, I remain insistent that a proper review period must provide opportunity for public discussion of the project. I am disappointed that GWP refused my request to present its proposal to a meeting in Eagle Rock and am astounded that it refused to hold any community meeting, even one in the City of Glendale.

109-7

I also note that my staff had signed up for updates on the project's informational website, <http://glendalebiogasgeneration.com>, but did not receive news relevant to public participation in the project, such as the extensions of the public comment period.

109-8

Public information and the opportunity for the public to provide input are fundamental expectations of the California Environmental Quality Act. GWP's persistent impairment of public input calls into question the adequacy of the MND. A full Environmental Impact Report [EIR] would be appropriate to help rectify the inadequate public process, because it would provide more analysis and a structured, iterative process for the public to provide input on the project.

109-9

Beyond the inadequate public process, I am concerned about specific elements of the proposal and the analysis presented in the MND. Numerous flaws in the analysis are cause to reject the findings of the MND and to require a full EIR for the project.

109-10

### **Piecemealing Improperly Evades Assessment of Cumulative Impacts**

Section 3.19 of the MND confirms the inadequacy of the use of an MND as an environmental review for the project, because it is being done in piecemeal fashion. Section 3.19 not only highlights GWP's intention to propose additional related projects, for which the impacts are not assessed, it also notes the relationship of the Biogas Generation Project to the proposed repowering of the Grayson Power Plant which is undergoing a separate but simultaneous environmental review.

109-11

The MND identifies two active proposals for the site, landfill expansion and a green waste digester, which have a direct bearing on the operations and impacts of a biogas generation facility, but it fails to provide a substantive evaluation of the cumulative impacts of these proposals.

109-12

Expansion of the landfill [which the document appears to mislabel as the "Biogas Renewable Generation Project"] is being pursued. "The City is proposing to increase the life of the Scholl Canyon Landfill and is evaluating two alternative development scenarios to increase capacity of

109-13

the landfill with construction occurring from 2020 - 2040” [p 3.19.2]. Landfill expansion is the subject of a flawed Draft EIR, circulated in 2014, to which my office provided comments. My comments were submitted in August 2014 and have not yet been responded to. An expansion of the landfill can be expected to increase the amount of gas produced by the landfill and accordingly the amount of gas combustion in the proposed project. Neither environmental document appears to account for this substantive variable, despite real potential for landfill expansion to both increase and elongate the negative impacts of gas combustion at the site.

109-13

In addition to direct impacts of combustion, this omission fails to assess the range of potential impacts that an MND is supposed to consider. For example, the 2014 DEIR for Scholl Canyon Landfill expansion indicates a potential increased footprint by 13 acres. In the MND for the proposed project, however, biological and stormwater impacts are limited to the project area of 2.2 acres. The MND does not adequately present or analyze these cumulative impacts and therefore underestimates impacts.

109-14

A “Green Waste Digester Project” is also being considered in isolation. “Use of green waste digesters which would produce methane for use as fuel in vehicles or for power production is being evaluated to meet the requirements of [state] law by 2020. The location of digesters, if used, has not been determined” [p 3.19.2]. A green waste digester may be expected to increase the amount of gas produced for combustion in the proposed project. The MND does not account for this or any other cumulative impacts that would result from the development of a digester project.

109-15

### **Failure to Consider Together the Biogas Generation and the Grayson Power Plant Repowering Projects Results in Unmitigated Negative Impacts**

The proposed project is an enabling component of the Grayson Power Plant Repowering Project, in which “The City of Glendale is proposing to repower the existing Grayson Power Plant with construction planned for 2018 - 2020... and a Draft Environmental Impact Report (EIR) is being prepared” [3.19.1 - 3.19.2]. The relationship is clear. GWP intends to develop the Grayson Plant free of landfill gas, and the proposed project enables that design.

109-16

In so doing, environmental impacts are shifted from Grayson to Scholl Canyon, and likely even increased. Yet these impacts are analyzed in isolation and therefore considered below significance thresholds. As an example, the MND claims that geographic separation is sufficient to establish a lack of significance in categories of Aesthetics [3.19.2], Air Quality [3.19.3], Noise [3.19.5], and Transportation and Traffic [3.19.6]. However, by spreading these impacts across two projects, the overall impact may be greater.

109-17

In practice, the Grayson project externalizes impacts onto another community, and by considering them in isolation, GWP fails to mitigate them. The following section on greenhouse gases provides a useful example.

109-18

Cumulative impacts are presented but are not compared to impacts that would be created if landfill gas continued to be combusted at Grayson. Without this comparison, the cumulative analysis in Section 3.19 cannot be fully understood or assessed by the public. Considering these projects in isolation is a fundamental flaw and a reason the MND is an insufficient environmental review.

109-18

### **Greenhouse Gas Analysis Is Improper and Emissions Should Be Mitigated**

Greenhouse gas [GHG] emissions from landfill gas combustion are offloaded from Grayson Power Plant onto the proposed project, and as such are left unmitigated.

109-19

The DEIR for the Grayson Power Plant states, “Landfill gas is currently piped from the Scholl Canyon Landfill to the Grayson Power Plant. However, by the time the [Grayson] Project is constructed, landfill gas will be retained and combusted at the Scholl Canyon Landfill. As a result, GHG emissions from the landfill gas combustion are not included in the baseline emissions inventory when determining the net GHG increase for the Grayson Repowering Project” [DEIR, Table 4-35, p 4.5.6].

109-20

It further states that the Grayson Project “is required comply [sic] with the State cap and trade program by reporting CO<sub>2</sub>e emissions from the Grayson Power Plant and acquiring allowances and offset credits to mitigate 100 percent of GHG emissions” [DEIR, Table 4.37, p 4.5.7].

109-21

In other words, GHG emissions at Grayson are being mitigated, but GHG emissions from landfill gas are considered the responsibility of the Biogas Generation project.

Consequently, the increase of 4,806 MT/year of GHG emissions in the Biogas Generation project is not mitigated or offset, because the MND considers it below the threshold of significance.

109-22

Furthermore, it appears that flaring is considered among the GHG baseline calculation but the promised 15-18 months of flaring during project construction is not included in the Net Increase of GHG Emissions [Section 3.7.2].

109-23

The MND falsely claims that “As shown in table 3.7-2, there is a net decrease of GHG emissions when comparing the potential of GHG emissions of the Proposed Project with historical GHG emissions from the existing equipment” [p 3.19.4]. In fact, table 3.7-3 shows a net increase, which is unmitigated and apparently underreported, as stated above.

109-24

The MND also falsely claims that “the net increase is from GHG emissions due to facility occupancy related activities” [3.7.4]. In fact, occupants are calculated to be 52 of the 4,806 MT/year net increase.

109-25

The analysis of GHG emissions is a shell game, buffeted by false claims and inaccuracies, which

results in a failure to mitigate impacts and is cause to reject the MND are require a full EIR.

109-25

**Air Pollution Is Not Adequately Mitigated and Air Pollution Credits/Offsets Should Not Be Presumed as a Project Objective**

The MND's Criteria Pollutant Emission Summary [Table 3.3-12, p 3.3.24] indicates a biased air quality analysis, which aims to obscure rather than mitigate significant impacts. It shows that the proposed project will exceed SCAQMD Mass Daily Significance Thresholds for four of the six Criteria Pollutants. However, it calculates credits/offsets to be purchased for or allocated to the project *before* concluding a level of significance. Instead, the level of significance should be determined according to the actual emissions, after which mitigations must be identified and incorporated into the Mitigation Monitoring and Reporting Plan.

109-26

In this case, the MND proposes to mitigate only two of the four offending pollutants *for their regional impact* through credits/offsets. No mitigation is offered for carbon monoxide [CO] and particulate matter [PM 2.5], and no mitigation of *local impacts* are offered for any of the other four pollutants. By definition, credits/offsets do not mitigate local impact; they are regional in scope.

109-27

Rather than seek to reduce pollution, the MND simply resorts to an alternative analysis. "SCAQMD does not provide Priority Reserve offsets for CO or PM2.5 emissions. As such, daily emissions of these two pollutants are above the SCAQMD daily screening level mass emission significance thresholds. For these two pollutants, a more complex significance determination is made to demonstrate that emissions of CO and PM2.5 are also below significance thresholds" [p 3.3.23 - 3.3.24].

109-28

I contend that the release of more than 900 pounds of carbon monoxide daily should be mitigated, but the MND makes no effort to identify strategies to filter or reduce these emissions. Alternatives should be presented and assessed that can reduce actual emissions at the smoke stack and not just through offsets--and certainly not through simply using "more complex" ways to obscure findings of significance.

109-29

However, GWP's reliance on offsets/credits instead of actual emissions reductions appears clear from the outset. One of the project objectives is to "Abandon the existing pipeline between the landfill and Grayson Power Plant, which would in turn allow the South Coast Air Quality Management District (SCAQMD) to make priority reserve offsets available and offsets would not have to be purchased on the open market" [p 1.2].

109-30

This objective calls into question the need for the project. Three of the five project objectives as presented in the MND can be met through the existing method of delivering landfill gas to the Grayson Power Plant. The two that cannot be met are the self-fulfilling "Build an on-site power plant" and "Abandon the existing pipeline...to make priority reserve offsets available [so they don't] have to be purchased on the open market."

109-31

Given this context, it's not clear that Priority Reserve credits should be presumed certain as presented in the MND. GWP must apply for Priority Reserve credits, and the SCAQMD shall have to consider the need for and public service from the proposed project. SCAQMD can be expected to note that the shifting of landfill gas away from Grayson Power Plant may contribute to an overbuilding of power supplies, as some contend is currently proposed by the Grayson Repowering Project, such that its maximum capacity appears intended to make power available for sale to the market beyond the local need of the City of Glendale.

109-32

### **Alternatives Exist and Should Be Analyzed**

The proposal cannot be adequately assessed because the MND fails to examine potential alternatives. The failure to present alternatives also unnecessarily limits the potential mitigations that could be implemented to address impacts. This is yet another flaw that could be rectified in an EIR. It is also further evidence that the improper separation of the Scholl Canyon Biogas project from the Grayson Power Plant EIR results in environmental impacts that would otherwise have to be mitigated or that could be avoided.

109-33

- There is no substantive discussion about the type of generating equipment that is proposed and whether other, cleaner technologies are available.
- There is no substantive discussion about the possibility of burning the gas at the Grayson Power Plant, by either conditioning the gas at Scholl Canyon or at Grayson. It appears that existing equipment could be upgraded as necessary to do so. The project proposes to demolish "existing equipment owned and operated by GWP required to treat the LFG prior to sending it to the Grayson Power Plant" [Section 2.3.1, mislabeled as p 1.4]. It is presented as an assumption that the Grayson Power Plant should no longer accept landfill gas even though that project is still in the planning stages and its environmental review is not complete. Given the existence of a pipeline already sending gas to the plant, the benefits of continuing to do so must be evaluated.
- The proposal asserts a need to tap into the Gas Company's gas line to augment the methane from the landfill, but there is no discussion about the potential to inject landfill gas from Scholl Canyon into the Gas Company's line, thereby providing renewable fuel to the area's gas supply without an increase in emissions.
- There is no discussion about whether it would be cleaner, more appropriate, and with fewer impacts to use the captured landfill gas as a transportation fuel, including to supply the fleets of natural gas trash trucks that visit the site. In failing to consider this alternative, the project predetermines without analysis the outcome of the Green Waste Digester Project "being evaluated" and "which would produce methane for use as fuel in vehicles or for power production" [p 3.19.2].

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- The potential to adjust the location of the site to minimize impacts has not been analyzed, despite finding that the expansion of the site’s footprint has impacts that must be mitigated.

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### **Flaring Is Falsely Presented as Unavoidable and Should Be Prevented**

The MND presents as inevitable that “During the 15-18 -month construction phase of Scholl Canyon Landfill Power Plant, the system piping landfill gas to GWP Grayson Power plant will be demolished; therefore, landfill gas will be combusted in the existing flare system at Scholl Canyon to control fugitive VOC and methane emissions” [p 3.3.19]. In fact, these wasteful flaring emissions could be avoided if the project proponent were to take seriously its responsibility to reduce and mitigate emissions.

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The project proposes to demolish “existing equipment owned and operated by GWP required to treat the LFG prior to sending it to the Grayson Power Plant” [Section 2.3.1, mislabeled as p 1.4]. Demolition does not appear to be essential to the construction of the Biogas facility, given that it is only being “restored to hard-packed dirt” [p 3.18.6]. The piping is to be “abandoned in place” [p 3.10.1, et al]. Flaring could be avoided by appropriately scheduling these two activities [demolition and abandonment] so that they occur only after the generation plant is constructed and before the Grayson Plant is fully repowered.

109-40

### **Noise Impacts Are Improperly Dismissed and Should Be Mitigated**

The MND makes conflicting statements regarding noise pollution: “There could be an overlap of noise sources from the Proposed Project, the proposed Scholl Canyon Landfill Expansion Project and the digester project (if located at the landfill) that could cumulatively affect a nearby sensitive receptor.” In defiance of the concept of a cumulative analysis, the MND then claims that “The Proposed Project would not have cumulatively considerable noise impacts” [p 3.19.5] and proceeds to deem the impact Less Than Significant.

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While the potential for cumulative impacts resulting from a combination with the Scholl Canyon Landfill expansion is explicit, the MND does not reflect on the analysis of noise that exists as part of the SCLF expansion DEIR.

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In that analysis, the only City of L.A. site measured was “approximately 80 feet west of the edge of Scholl Canyon Access Road along North Figueroa Street.... at a similar distance from the Scholl Canyon Access Road as the nearby homes” [SCLF Expansion DEIR, 6-10-14]. This site registered the highest noise impacts, however, the MND selected other Los Angeles residences to represent noise impacts.

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Notably, and consistent with the findings of the Expansion DEIR, it is a City of Los Angeles residence that recorded the highest noise levels in the MND [p 3.12.6].

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Noise, as one of the “Environmental Factors Analyzed Cumulatively” is an example of the improper application of cumulative analyses in the MND, which adds to the inadequacy of the MND. While negative impacts compound due to proposed projects at the site, the MND dismisses components of each project instead of mitigating them. In the example of noise, the impacts of the proposed project are disregarded as relatively small; the impacts from the green waste digester are disregarded as not having been studied; and the impacts of the proposed expansion are simply disregarded without cause or discussion despite being a topic of a purportedly active EIR process.

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This facetious approach to cumulative analysis is cause to reject the MND and should be rectified through a more comprehensive analysis in a full EIR.

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Area residents are already suffering noise impacts from the landfill and trucks associated with landfill operations. These impacts are ignored and instead must be mitigated through immediate, specific actions, including to address additional traffic and truck noise during construction of the proposed project.

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### **Aesthetics Impacts Are Not Adequately Presented, Analyzed or Mitigated**

The MND states “The tallest features will be approximately 40 ft (four exhaust stacks) aboveground surface” [sic], which is taller than any existing equipment at the site [p 3.1.10].

In the sole view from property in the City of Los Angeles provided in the document, “Existing site trailers are visible along ridgeline” [Photo 2, p 3.1.6].

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Despite being the only view from the Los Angeles side of the site, Photo 2 refutes both arguments made in the MND that there will be no impact. First, the MND dismisses the potential aesthetic impact by saying that “The Proposed Project would be consistent with the industrial character” of the existing facility. Second, the MND claims that “due to natural features between the Proposed Project site and public viewing areas, the Project would not likely be visible” [p 3.1.10].

The analysis can’t have it both ways. The site cannot be aesthetically of both “industrial character” and “natural features.” In either case, the analysis understates the impact. The exhaust stacks are far taller than existing equipment, greatly magnifying any industrial character, and given that smaller trailers are already visible against an otherwise natural setting, the proposed project will have a significant visual impact which must be mitigated.

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The presentation of only one viewpoint from the City of Los Angeles is inadequate and is insufficient to provide a complete impression of the Proposed Project. Without further information, the public is unable to adequately assess the potential impacts of the project.

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In particular, a proper analysis should have assessed views from additional locations, including at a minimum: hillside streets and homes, including those south of Colorado Blvd; the Alatorre-Eagle Rock Park adjacent to Scholl Canyon Road; and the popular public walking trail on the hillside adjacent to the Eagle Rock Historic Cultural Monument. From these views, a graphic representation of the Proposed Project should have been presented to show the scale of impact in comparison to existing equipment that is already visible.

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With respect to light and glare, the claims of the analysis are again contradicted by even the limited factual information presented. The MND claims “The incremental amount of light and glare generated by the Proposed Project would be minimal... because the Project site is located in a portion of the existing landfill that is negligibly visible from public viewing locations. Therefore, impacts would be less than significant” [p 3.19.2]. As discussed above, the existing landfill is visible, and there is no supporting evidence provided that the light or glare will in fact be “negligibly visible,” whatever that means.

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The MND claims minimal light and glare “due to the design measures incorporated into the Project” [p 3.1.10]. For this claim to be enforceable, design measures should be included in the Mitigation Monitoring and Reporting Plan, with specific measurable limits on off-site glare. Without the establishment of these design elements as mitigation measures, GWP is simply asking that the landfill’s neighbors accept a promise that light and glare won’t have a significant impact and will be “negligibly visible.”

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### **Impacted Schools and Residents Are Not Properly Identified or Analyzed**

The failure to properly identify those impacted by the project further undermines the credibility of the MND and underestimates the potential to impact sensitive populations.

The MND states, “The nearest school, Eagle Rock Elementary School, is located approximately 1.5 miles to the southwest of the of the Project site. Therefore, no impacts would occur” [p 3.8.10].

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This is simply not accurate. PUC Cals, located at 7350 N. Figueroa St., Eagle Rock Montessori School, located at 1439 Colorado Blvd., and Dahlia Heights Elementary, located at 5063 Floristan Ave., are a mile from the project. Rockdale Elementary, located at 1303 Yosemite Dr., St. Dominic’s School located 2005 Merton Ave., and Eagle Rock Junior/Senior High School, located at 1750 Yosemite Dr., are all located within 1.5 miles of the Proposed project.

The MND states, “The nearest non-residential sensitive receptor, which is Eagle Rock Elementary School, is located more than one and a half mile to the southeast of the Project” [p 3.3.44]. Again, this statement is not accurate. The Eagle Rock Child Care Center, located at 1102 Eagle Vista Dr., is located 0.8 miles from the proposed Project site.

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The MND references the closest elderly care facilities as “approximately five to eight miles to

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the west from the Project site” [p 3.8.5]. Once again, this is not accurate. Solheim Senior Community, located at 2236 Merton Ave., as one example, is only 1.5 miles from the proposed Project.

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Furthermore, in section 3.13.1, the MND references the nearby residential communities that may be affected by the project. It lists the Glendale communities of Glenoaks Canyon (“approximately 0.5 acres directly west of the SCLF”) and the Chevy Chase neighborhood (0.85 mile from the proposed project) It also references the community of Linda Vista in the City of Pasadena (0.5 miles from the proposed project). However, it does not mention the residents that live on the 7600 block of North Figueroa Street (0.85 miles from the proposed project) who will experience the largest impact from project construction because all vehicles must pass by this block to access the landfill.

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These glaring errors are cause for a more thorough evaluation of the project through a full EIR. They also appear to be a symptom of the systematic disregard of stakeholders in the City of Los Angeles throughout the process. If GWP is unable to identify nearby residents, senior centers, child care facilities, and schools, how can the public be assured that it is properly accounting for impacts? It is further evidence of the lack of consideration given to nearby residents and stakeholders throughout the environmental review process and of the need for a more thorough review.

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### **Historic Resources in Los Angeles Are Ignored**

The Proposed Project is nearby at least two Historic Cultural Monuments in Los Angeles: the Eagle Rock Monument and the Eagle Rock Recreation Center. At the base of the Eagle Rock Monument is a popular hiking trail, the Eagle Rock Canyon Trail, located less than a mile from the proposed project. The Eagle Rock Recreation Center, designed by famed California architect Richard Neutra, blends both indoor and outdoor space to cool the building. It is actively used for children and teen sports.

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The MND, however, makes no mention of these historic resources. Both are located close to the proposed project and, as outdoor spaces, are particularly susceptible to negative impacts of air quality, noise and visual impacts, in addition to the cumulative impacts of the proposed project on top of ongoing negative impacts from the landfill’s operation. These impacts are not considered. The project should consider and establish appropriate mitigations to protect these Historic Cultural Monuments.

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### **Stormwater Analysis Is Inaccurate**

The MND claims that “The Proposed Project footprint would represent an approximately 2.2-acre expansion over the existing facility.” It continues that accounting for existing equipment on 0.33 acre decreases “the area of effective expansion to approximately 1.66 acres.” The math

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does not add up, in yet another example of sloppy analyses that undermine the credibility of the document's claims.

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In addition, it is not supported that the 0.33 acres should be subtracted from the area of concern. The MND says the 0.33 acres "would be restored to hard-packed dirt to match the surrounding ground surface within the project footprint," but that does not necessarily equate to reduced stormwater impacts [p 3.18.5 - 3.18.6]. In fact, it is further evidence that the document fails to seek appropriate mitigations for its impacts. A more comprehensive analysis might identify acreage that could be restored not to hard-packed dirt to match the surrounding landfill but to native habitat to match the surrounding natural landscape.

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Further discussion of temporary stormwater systems is necessary. "Stormwater flow from the Project area will either be routed to the existing storm drains within the existing project footprint, the new catch basin, or into temporary energy dissipating structures or silt traps, all of which ultimately drain in to the active landfill's permanent drainage system" [p 3.18.5]. It is unclear how significant the temporary structures are to accommodating stormwater needs, how temporary these are, and how their capacity will be provided when they are no longer employed.

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### **Emergency Response Plans Are Inadequate and as such Place Burden on the City of L.A.**

The MND states, "Wildland fires (wildfires) can occur in open spaces containing a mixture of flammable and nonflammable vegetation cover. The native areas surrounding the active landfill operation area are vulnerable to wildfires due to the steep topography, highly flammable scrub vegetation and limited access for firefighting. The County Fire Department has published Fire Hazard Severity Zone Maps for the City and has listed the Project site, as shown on Tile 4 of these maps, in the Very High Fire Hazard Zone" [p 3.8.5]

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The MND lists the first responder to a fire at the Proposed Project Site as the nearest Glendale Fire Department, Station 23, located at 3303 E Chevy Chase Drive, which is approximately 5 miles from the Proposed Project. However, with the primary access road to the project located in Los Angeles a large scale event would likely enlist the City of Los Angeles as the first responder. Los Angeles has three fire stations located in Northeast Los Angeles within three miles of the Proposed Project: 2021 Colorado Blvd., 4455 York Blvd., and 5921 N. Figueroa St.

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The fire hazard is exacerbated by the proposed project in that "GWP plans to store only up to 3,000 gallons of aqueous ammonia" [p 3.8.10], along with "an approximately 2,000-gallon lube oil storage tank, as well as a 3,000-gallon capacity waste oil storage tank," and "Waste oil contained in 55 gallon barrels... located throughout the facility" [p 3.8.8].

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Despite having parks, schools, residences, critical infrastructure, and child care facilities located in proximity to the Proposed Project, the MND fails to present any credible emergency response plan in case of a large scale event. Such an event would certainly draw on City of Los Angeles resources and preparedness of these resources should be accounted for in a mitigation plan.

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My office stands ready to assist GWP in coordinating with the City of Los Angeles to develop an appropriate emergency response plan, which should also include the County of Los Angeles and which should be considered as part of a more comprehensive analysis in a full EIR.

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### **Mitigation of Biological Impacts Is Inadequate**

Biological impacts are the only impacts for which the MND establishes mitigations, and these “mitigations” appear merely to be standard attempts to avoid impacts. GWP should approach the question of mitigation more broadly. There is opportunity to not only attempt to avoid impact but to make positive impacts through mitigation, something that can help address the cumulative, historic and ongoing negative impacts of the existing landfill.

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For example, since undisturbed habitat is being disturbed, GWP should provide habitat restoration nearby. The document states, “It is likely that the ridgelines on and off the SCLF property would serve as the principal wildlife movement and dispersal corridors for most species found on or in the immediate vicinity of the Proposed Project, and species will not need to cross through open, disturbed areas of the SCLF” [p 3.4.21]. While there is no support provided for this claim, if GWP wishes to assert it, GWP could and should help ensure it. To encourage species to use areas outside the active areas of SCLF, GWP should use mitigation to expand, through replanting and restoration, an amount of unbroken area that is hospitable to wildlife movement.

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More in-depth analysis and project planning is necessary to ensure appropriate mitigation of biological impacts and should be provided through a full EIR.

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### **Mitigations Are Insufficient and Must Be Expanded**

The MND offers minimal and insufficient mitigation, as discussed above. While the document attempts in many places to reassure the public that impacts will be managed or reduced by project design, these assurances are hollow unless incorporated into the Mitigation Monitoring and Reporting Plan [Section 4].

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There is a historic lack of mitigation of the negative impacts of the landfill on Los Angeles and Eagle Rock; Eagle Rock bears the brunt of negative impacts while Glendale reaps the benefits of the landfill. The imbalance of cost and benefit to Los Angeles is exacerbated by the fact that Scholl Canyon and the proposed project are sources of revenue for the City of Glendale and by the MND’s failure to consider impacts on sites in L.A., including schools, historic monuments, recreational amenities, and aesthetic reference points.

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Therefore a robust and more expansive approach to mitigations is required in order to properly address the apparent attempt by GWP to further industrialize the site with a power plant and a green waste digester, all the while continuing to threaten landfill expansion.

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Expanded mitigations, in addition to what has been suggested above and to those that would result from a more comprehensive environmental analysis, could include but are not limited to:

1. Rejection of the proposed landfill expansion;
2. Establishing a mitigation fund and directing a portion of it to the City of Los Angeles for use in addressing local impacts such as street repair;
3. Specific plans to reduce off-site impacts on City of Los Angeles residents and businesses that are affected by waste hauling trucks that use local streets as access roads, including but not necessarily limited to impacts related to traffic, litter, noise and environmental quality;
4. Mitigating the noise level from trucks using the 134 freeway by setting aside landfill revenue to fund a sound wall along the 134 above Eagle Rock;
5. Structuring tipping fees to encourage clean-fuel vehicles. Additional fees on dirtier vehicles could be used to subsidize a transition to cleaner fuels;
6. Increasing native habitat and enhancing wildlife corridors;
7. Improved access to the Glendale Hills Trail for Eagle Rock residents. Currently the trail ends at the fence line on the western side of the landfill. Expanding the trail such that it allows hikers to continue beyond the landfill would allow a connection to the Eagle Rock Canyon Trail and other recreational amenities.

## Conclusion

Though City of Los Angeles businesses and residents are not allowed access to the landfill and will not directly benefit from the power produced by the proposed project, the City, its residents and businesses are stakeholders in the proposal. As immediate neighbors to the landfill, potential impacts of environmental quality, hazards and emergency response have a direct relationship to the City of Los Angeles. The only active entrance to the site is through the City of Los Angeles. This access point is adjacent to homes, schools, a childcare facility, a major City park, and historic cultural monuments – all in the City of Los Angeles. As such, City stakeholders bear a significant burden from the operation of the landfill.

Contrary to the MND's assertion, its analysis does not consider "incremental effects of the Proposed Project in connection with effects from past, current, and probable future projects" [p 3.19.1]. The MND fails to acknowledge that cumulative impacts exist from the existing and ongoing negative impacts of the landfill operation. Adding insult to injury, the impacts of the proposed project are almost entirely unmitigated.



The MND is flawed and inadequate. The analysis is improperly piecemealed from other proposed industrial activity at the site, the proposed expansion, and the Grayson Power Plant. Alternatives are not examined. Cumulative analyses are flawed as are those of greenhouse gases, air quality, aesthetics, noise, stormwater and biological impacts. The proposal fails to provide adequate emergency planning. The Mitigation Monitoring and Reporting Plan is far too narrow to be enforced and to provide assurance to the public. Sensitive populations are improperly identified, key stakeholders have been ignored, and public participation has been actively discouraged.

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For these reasons and based on the inadequacies and flaws pervasive throughout the MND, I urge GWP to reject the the findings of the MND and to begin a more comprehensive and inclusive analysis through a full EIR.

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Sincerely,



JOSE HUIZAR  
COUNCILMEMBER, DISTRICT 14  
CITY OF LOS ANGELES

cc: Glendale Mayor Vartan Gharpetian  
Councilmember Ara Najarian  
Councilmember Paula Devine  
Councilmember Zareh Sinanyan  
Councilmember Vrej Agajanian  
GWP Commission President Manuel C. Camargo  
GWP Commissioner Terry Chan  
GWP Commissioner Sarojini Lall  
GWP Commissioner Hrand Avanesian  
GWP Commissioner Matthew Hale  
Stephen Zurn, Director, GWP  
April M. Fitzpatrick, Assistant General Manager, GWP  
Maurice Oillataguerre, Environmental Program Administrator, GWP  
Los Angeles County Supervisor Hilda Solis

November 8, 2017

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206  
djoe@glendaleca.gov

Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.

2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (landfill expansion and anaerobic digester)

3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Thank you for your time.

Best Wishes,  
MIKE SMITHSON  
101 N. Verdugo Road #9868,  
Glendale, Ca 91226

110-1  
110-2  
110-3  
110-4  
110-5  
110-6  
110-7

**From:** [Arin Rao](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov); [president@tera90041.org](mailto:president@tera90041.org); [EAPD.LA@gmail.com](mailto:EAPD.LA@gmail.com)  
**Subject:** Glendale Gas Plant and Scholl Dump  
**Date:** Thursday, November 09, 2017 6:52:18 PM

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111

Dear Dennis Joe,

I am writing to express my strong concern and opposition to the building of a gas plant at Scholl Dump. Our children's health is at stake.

I am a long time Glendale resident and feel that this will have a very negative impact on our community.

Sincerely,  
Arin Rao

• 111-1  
•  
• 111-2  
•

**From:** [rc](mailto:rc)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Cc:** [president@tera90041.org](mailto:president@tera90041.org); [eapd.la@gmail.com](mailto:eapd.la@gmail.com)  
**Subject:** Concerns regarding plans to build a gas plant at Scholl Canyon Landfill  
**Date:** Thursday, November 09, 2017 2:54:45 PM

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112

Dennis Joe  
Municipal Services Building  
Room 103  
633 East Broadway  
Glendale, California  
91206-4386

Mr. Joe:

I am a homeowner in the Eagle Rock neighborhood of Los Angeles. I live on Dahlia Drive, between Hill Drive and Colorado Boulevard. I am writing to express my serious concerns about Glendale's plans to proceed with building a new gas plant at the Scholl Canyon Landfill. My family and I live near the landfill and I am deeply worried about potential harmful negative effects the new plant may produce. I am especially concerned that Glendale has not taken into consideration the effects this plant will have on air quality and the safety hazard the plant will pose to communities that neighbor Glendale, such as my neighborhood.

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I strongly believe that we should not locate a highly combustible experimental Anaerobic Digestion Facility and Power Plant at Scholl Landfill, right in the middle of residential neighborhoods. Methane should be generated, stored, and converted in an industrial area, instead of our backyards. We certainly don't want Glendale or Eagle Rock to become the next Porter Ranch.

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112-5

Sincerely,  
Ashfaq (Ron) Chowdhury  
5201 Dahlia Drive.  
Los Angeles, CA 90041  
323-947-4690

**From:** [Adrineh Zarokian](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov); [Devine, Paula](#); [zsinanyan@glendaleca.gov](mailto:zsinanyan@glendaleca.gov); [Vartan Gharpetian](#); [vagajanian@glendaleca.gov](mailto:vagajanian@glendaleca.gov); [anajarian@glendaleca.gov](mailto:anajarian@glendaleca.gov)  
**Subject:** Comment for Biogas Renewable Generation Project MDN, Scholl Canyon Landfill  
**Date:** Thursday, November 09, 2017 7:56:44 PM

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## Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Dennis Joe:

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the impacts listed below and request that all proposed projects at Scholl Canyon Landfill be placed on immediate hold and an Independent third party be hired to study the cumulative health and environmental impacts of Scholl Canyon Landfill, proposed Power Generators and Anaerobic Digestion Facility.

113-1

### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to "offset" these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only. The Scholl Canyon Landfill, in its current state, is already exceeding the AQMD thresholds for criteria pollutant emissions. In this day and age, the City of Glendale should be aiming for projects which would reduce emissions, NOT increase them.

113-2

2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. A study must be done to factor in the CUMULATIVE effects of the landfill and all proposed projects at the Scholl Canyon Landfill site.

113-3

3. The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

113-4

### Hazards

1. Power plants, power lines combined with methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a "Very High Fire Hazard Zone" by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills in this Very High Fire Hazard Zone. What happens if the area surrounding the water tank is on fire, deeming it impossible to reach the water tank? How does the City of Glendale propose to protect the residents and Elementary School students in the immediate vicinity of Scholl Canyon Landfill during such a probable catastrophe?

113-5

2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire. How does the City of Glendale propose to address this situation?

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### **Geology**

1. There are several earthquake fault lines within close proximity to the proposed generator. There

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are no proposed mitigation from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children's baseball fields are located.

### **Cumulative Impacts**

1. The City and this MND report have not taken into account the cumulative health and environmental

113-8

impacts of all three pending projects: the power generators, the anaerobic digester facility and the subsequent Scholl Canyon Landfill expansion. The cumulative effects of all three on human health and the environment must be studied. To ignore the cumulative impacts is a dishonest and misleading tactic, one that leads City of Glendale residents and neighboring residents to mistrust our Glendale City Government.

On behalf of CFLA, Coalition for Landfill Alternatives, I request that all proposed projects at Scholl Canyon Landfill be placed on immediate hold and an Independent third party be hired to study the cumulative health and environmental impacts of Scholl Canyon Landfill, proposed Power Generators and Anaerobic Digestion Facility.

113-9

Thank you for your time and consideration,

Audry Zarokian

CFLA, President

818-731-2105

**From:** [barrett cooke](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov); [president@tera90041.org](mailto:president@tera90041.org)  
**Date:** Thursday, November 09, 2017 3:50:16 PM

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As an Eagle Rock resident I am STRONGLY against the plans to add a gas plant to the already blight-ful dump in Glendale. Please do not put your backyard waste and hazards in our front yard. Not only is it un-neighborly, it is dangerous for us.

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114-2

Thank you,  
Barrett Cooke  
90041



**From:** [Carrie Hansen](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** No Scholl dump expansion!  
**Date:** Thursday, November 09, 2017 3:36:12 PM

---

Mr Joe,

I'm writing to express my extreme displeasure to hear about Glendale's plans to expand the Scholl landfill. This will impact Eagle Rock disproportionately, ruining a lovely community with Glendale's garbage. I am opposed to any expansion efforts that will impact the city of Los Angeles and Eagle Rock. Find a spot in Glendale - with access through Glendale! - and let your residents face their own waste.

115-1

Thank you,

Carrie Hansen  
Los Angeles, 90041



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

MARK PESTRELLA, Director

116

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: **EP-5**

November 9, 2017

Mr. Dennis Joe  
City of Glendale  
Community Development Department, Planning Division  
633 East Broadway  
Glendale, California 91206-4386

Dear Mr. Joe:

**SCHOLL CANYON LANDFILL  
BIOGAS RENEWABLE GENERATION PROJECT  
COMMENTS ON DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

The Los Angeles County Department of Public Works (Public Works) appreciates the opportunity to comment on the Draft Initial Study/Mitigated Negative Declaration (MND) for the City of Glendale's proposed Scholl Canyon Landfill Biogas Renewable Generation Project (Project). The comment period for this MND was set to run from August 31, 2017, through September 30, 2017, and was subsequently extended to November 9, 2017.

**Background**

The Project consists of the construction and operation of a 12-megawatt power generation facility to be located at Scholl Canyon Landfill (Landfill) property. The Project involves new construction activity on approximately 2.2 acres of land, including the proposed power plant facility, natural gas pipeline, water pipeline, and two water tanks. Gas generated and collected at the Landfill will be used as fuel for the proposed power generation facility.

The purpose of the Project is to beneficially utilize the renewable landfill gas as fuel to generate electricity on-site instead of transferring it off-site to the Grayson Power Plant.

The Landfill site occupies 535 acres with portions owned by the City of Glendale, County of Los Angeles, and by Southern California Edison Company. The Project will be located on land owned by the County. The Landfill is owned and operated through a Joint Powers Agreement between the City, County, and County Sanitation Districts. Regional access to the Landfill is from the Ventura Freeway (State Route 134) at the Figueroa Street exit.

### **Specific Comments**

Public Works has reviewed the Draft Initial Study/MND dated July 31, 2017, prepared by Stantec Consulting Services, Inc., for the City of Glendale, and offers the following comments:

#### Section 2.5.2 - Phase II, Site Grading and Construction, Page 1.12

- The Draft Initial Study/MND does not address how the Landfill would manage dust pollution resulting from the stockpiling of 20,000 CY of soil (for future use) from the grading excavation activities.

#### Section 3.3.2 - Air Quality Impact Analysis, Construction Impacts due to Landfill Gas Combustion, Page 3.3.19

- The Draft Initial Study/MND does not address the potential odor nuisance that could occur during construction when the existing Landfill gas pipeline to the Grayson Power Plant is capped and the gases are diverted to the existing flare system as well as the measures that would be put in place to control fugitive VOC and methane emissions.

#### Section 3.12 – Noise

- The Draft Initial Study/MND does not discuss the rationale behind the selection of the six representative sensitive receptors and the location of receptor R1 in particular (Figure 3.12-1).
- The draft initial study/MND does not identify the source for the following data:
  - “Presumed Ambient Noise Level (dBA)” (Table 3.12-4)
  - “Facility Noise” and “Combined Noise Ambient + Facility” (Table 3.12-5)
- The discussion of noise impact thresholds does not provide a basis for the use of the factors selected.

116-1

116-2

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116-4

116-5

Mr. Dennis Joe  
November 9, 2017  
Page 3

Section 3.16 Transportation and Traffic

- Per the City of Glendale's website, there are three currently proposed projects at the Landfill: the Scholl Canyon Landfill Expansion Project, the BioGas Renewable Energy Facility Project, and the Anaerobic Digestion Facility Project. These projects would utilize the same hauling routes, access roads, and feeder roads and will potentially be operating at the same time. The Draft Initial Study/MND does not discuss or analyze the combined impact of these projects on the traffic patterns at the entrance and the adjacent surrounding communities.

116-6

Section 3.8.2 - Hazards and Hazardous Materials, operations and Maintenance,  
Page 3.8.9

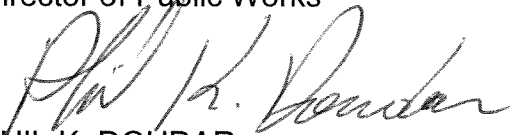
- The Draft Initial Study/MND does not address potential hazards arising from the presence of methane, carbon dioxide, and other gases during construction activities as well as measures that would be put in place to address those hazards.

116-7

For questions regarding this matter, please contact Mr. Martin Aiyetiwa of Environmental Programs Division, Landfills Section, at (626) 458-3553 or [maiyet@dpw.lacounty.gov](mailto:maiyet@dpw.lacounty.gov).

Very truly yours,

MARK PESTRELLA  
Director of Public Works



PHIL K. DOUDAR  
Assistant Deputy Director  
Environmental Programs Division

ND:td

P:\epub\Secfinal\EP-5 Landfills\2017 Folder\Letters\Comments on MND.docx

cc: Chief Executive Office (Bradford Bolger, Al Tizani)  
County Counsel (Julia Weissman)  
Sanitation Districts of Los Angeles County (Grace Robinson Hyde)  
Glendale City Attorney (Dorine Martirosian)  
Lewis Brisbois Law Office (Claire Hervey Collins)

**From:** [Emily Simon](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** Opposing Scholl Canyon  
**Date:** Thursday, November 09, 2017 4:06:17 PM

---

117

Dear Mr. Joe,

As a mother raising a child in Eagle Rock, I cannot speak strongly enough against the Gas Plant at Scholl Dump. It is already literally poisoning our neighborhood, and now we're setting it up to - again, literally - explode.

117-1

A gas-powered plant in that location WILL end in disaster that you could have prevented.

117-2

Please do your part to keep us safe.

117-3

Thank you,

Emily Simon  
Eagle Rock resident

**EAGLE ROCK  
NEIGHBORHOOD COUNCIL**

Lisa Kable Blanchard, President  
Cyndi Otteson, Vice President  
Miry Whitehill, Treasurer  
Matt Hemingway, Secretary  
Pat Niessen, Communications  
David Greene, Immediate Past  
President

**CITY OF  
LOS ANGELES  
CALIFORNIA**



Eric Garcetti  
MAYOR



P.O. Box 41652  
Los Angeles, CA 90041

[www.ernc.la](http://www.ernc.la)  
[info@ernc.la](mailto:info@ernc.la)

118

November 9, 2017

Councilmember José Huizar  
200 Spring St.  
Los Angeles, CA 90012

cc: Dennis Joe, Case Planner  
Community Development Department, Planning Division Office  
633 E. Broadway, Room 103  
Glendale, CA 91206  
[djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)

Dear Councilmember Huizar,

The Eagle Rock Neighborhood Council (ERNc), which represents over 45,000 stakeholders in the City of Los Angeles, objects to the City of Glendale's Mitigated Negative Declaration for the proposed biogas plant at the Scholl Canyon landfill. We concur with you that the MND is flawed and inadequate, and that public participation has been actively discouraged. Our objections include:

- There was no public meeting held in the City of Los Angeles to provide information about and take public comment on the MND, even though most of the negative impacts from the proposed project will affect Eagle Rock residents. It is incomprehensible that as the Lead Agency, the City of Glendale would provide no opportunity for input to Los Angeles stakeholders on an MND for a project that, as stated in the MND, is "primarily accessed from Figueroa Street in the City of Los Angeles," and which uses a Los Angeles, 90041 address on its official documents.
- As in the City of Glendale's 2014 Draft Environmental Impact Report for a proposed expansion of the Scholl landfill, the MND focuses almost exclusively on impacts on the City of Glendale, when the negative impacts of the project -- environmental, health, aesthetic, sound, and otherwise -- will almost exclusively harm Los Angeles residents.
- Also as in Glendale's 2014 DEIR, the MND uses biased statistics to discount the negative impacts on Eagle Rock: among these are sound readings taken at Eagle Rock residences where ambient freeway noise is at its highest, and selective sightlines that minimize the visual pollution that will result from a natural-gas power plant perched on a ridge that looks down on our homes.

We urge you to use your authority as a Los Angeles City Councilmember to ensure that Eagle Rock stakeholders get a say in this process, and ask that you demand that GWP reject the MND, and start the process over with a full Environmental Impact Report.

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Furthermore, we remind you that outside access to the Scholl Canyon Landfill is exclusively via Los Angeles city streets, and encourage you to consult **City Council File: 86-1465**, in which the City Attorney and Director of the Bureau of Sanitation were instructed in 1986 to *“explore all available means of challenging the implementation of the Glendale City Council ban to prohibit the disposal of refuse collected in the City of Los Angeles at the Scholl Canyon Landfill, including consideration of a weight limit on Figueroa St north of the Ventura Freeway.”*

118-6

While this Council motion was passed at a time when the City of Los Angeles did not have the robust waste diversion program it has now, and L.A. no longer needs to dump its refuse at Scholl Canyon, CF 86-1465 set an important precedent by identifying legal and pragmatic means to ban heavy trash haulers from using L.A. streets to reach Glendale’s dump. If this Council file were revived, it could compel the City of Glendale to use its own streets to access its own facility, sending the pollution-spewing trucks that now traverse our neighborhood through Glendale neighborhoods, as originally intended when the dump was first conceived. This would likely cause Glendale’s politicians and department heads to finally take the health hazards of the Scholl landfill seriously, rather than continue dumping those problems in their backyard -- which happens to be Eagle Rock’s front yard.

118-7

Respectfully,

The Eagle Rock Neighborhood Council Board

cc:

Glendale Mayor Vartan Gharpetian  
Glendale Councilmember Paula Devine  
Glendale Councilmember Ara Najarian  
Glendale Councilmember Zareh Sinanyan  
Glendale Councilmember Vrej Agajanian  
GWP Commissioner Sarojini Lall  
GWP Commissioner Manuel Carmargo, Jr  
GWP Commissioner Matthew Hale  
GWP Commissioner Roland Kedikian  
GWP Commissioner Hrand Avanesian  
GWP General Manager Steve Zurn  
Sean Starkey, Deputy, L.A. Council District 14  
Greg Merideth President, The Eagle Rock Association  
Los Angeles County Supervisor Hilda Solis



**From:** [Frankie Norstad](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Cc:** [president@tera90041.org](mailto:president@tera90041.org); [EAPD.LA@gmail.com](mailto:EAPD.LA@gmail.com)  
**Subject:** NO to Scholl Expansion  
**Date:** Thursday, November 09, 2017 3:12:35 PM

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119

Dennis,

I am a concerned resident and a proud voting constituent in Eagle Rock. I am strongly opposed to the Scholl Expansion and plans to build a gas plant. With our federal government denying climate change it is vital we do everything in our power locally to help the environment. I'm worried about the air quality, I'm worried about leaks, I'm worried about global warming.

● 119-1  
● 119-2  
● 119-3  
● 119-4

Please stand up and vote NO.

Thank you,

Frankie

415-225-0747

<http://FrankieNorstad.com>

November 9, 2017

Mr. Dennis Joe  
Community Development Department  
633 East Broadway, Room 103  
Glendale, California 91206-4386

RE: Scholl Canyon - Biogas Renewable Generation Project

Dear Mr. Joe:

On behalf of the board of The Eagle Rock Association (TERA), I am again writing to you regarding the City of Glendale's proposed biogas renewable generation project at the Scholl Canyon Landfill. As mentioned in our October 9, 2017 letter, The TERA board, along with others within the community of Eagle Rock, have many questions regarding this project. While we appreciate that the City of Glendale (Glendale) has extended the comment period for the Mitigated Negative Declaration (MND), we are disappointed that Glendale has chosen not to use that time to hold a public forum to directly address concerns held by the residents of Eagle Rock.

Instead, Glendale has provided us with a 1,300-page tome, which is impossible for the average citizen to wade through, even given the additional comment time. Given that the Scholl Canyon facility abuts and has its sole access through our community, it is possible, if not likely, that this project will have negative impacts with regard to Eagle Rock community's:

- Air
- Water
- Noise
- Traffic
- Fire safety
- Visual aesthetics

In addition, we believe that a MND is inappropriate for this project. We believe that the Scholl Canyon power plant proposal is an extension of the project to repower the Grayson Power Plant. Therefore, they should be considered as one project and should be subject to a full Environmental Impact Report (EIR).

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Finally, we are concerned that Glendale's potential investment in the construction of a power plant at Scholl Canyon will inevitably lead to the expansion of landfill and an extension of its lifespan.

120-10

Given the above-mentioned concerns as well as the fact that Eagle Rock residents receive no actual benefit from the Scholl Canyon Landfill nor this proposed power plant, I must ask that the City of Glendale and Glendale Water and Power reject the findings of this MND and perform a full EIR.

120-11

Sincerely,



Greg Merideth  
President

cc: Mayor Vartan Gharpetian  
Councilmember Paula Devine  
Councilmember Ara Najarian  
Councilmember Zareh Sinanyan  
Councilmember Vrej Agajanian  
GWP Commisioner Sarojini Lall  
GWP Commisioner Manuel Carmargo, Jr  
GWP Commisioner Matthew Hale  
GWP Commisioner Roland Kedikian  
GWP Commisioner Hrand Avanessian  
GWP General Manager Steve Zurn  
Sean Starkey, Deputy, L.A. Council District 14  
David Greene, Eagle Rock Neighborhood Council

**From:** [Hans Johnson](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** Communities United letter opposing Scholl Canyon gas plant  
**Date:** Thursday, November 09, 2017 3:26:24 PM  
**Attachments:** [HP0052.pdf](#)

---

121

Dear Dennis:

We are submitting a group letter of OPPOSITION to the proposed placement of a gas plant at the dump at Scholl Canyon, expressing the concerns of 32 local residents--more than a third of them Glendale residents, community leaders, and active voters.

In addition to the piecemeal approach we believe Glendale is wrongly pursuing in regards to its planning policies, we are disturbed by the continued prioritization of energy and solid-waste practices that put the health and safety of nearby residents and the environment at grave risk while abrogating responsible stewardship and openness in decision-making. The concern is all the deeper because this is a matter with great consequence, and risk, for neighbors and jurisdictions adjacent to Glendale on whom the dump has impinged for more than 56 years.

Our letter is attached. We look forward to your reply and real solutions on energy and solid-waste practices that honor Glendale's Zero-Waste goals, the environment, and the lives and health of residents today and in the future.

Hans Johnson  
Convener, Communities United to Stop Scholl Dump Expansion  
ph 323-669-9999  
Follow on Twitter: @HansPJohnson  
<http://www.huffingtonpost.com/author/hanspj-774>

121-1

121-2

121-3

121-4

# Communities United



## We Oppose Glendale's Effort to Build a Gas Plant at the Dump in Scholl Canyon

October 17, 2017

Communities United is a multi-jurisdiction nonpartisan coalition formed in 2015, one year after Glendale announced an effort in May 2014 to expand by 17 more stories (180 feet) and extend by at least 20 more years the trash pile at Scholl Canyon. Scholl Dump sits on more than 500 acres at the north end of Figueroa Street, in the southeast corner of Glendale, near the landmark Eagle Rock, just north of the 134 Freeway, not far from the western boundary of Pasadena.

All garbage enters Glendale's dump through Eagle Rock, with hundreds of dump trucks each day depositing tons of trash at the site. Pollution stemming from Glendale's dump imposes major health burdens, costs, anxiety, and degradation of value on its neighbors.

The dump opened in 1961, before federal standards required a solid rock base beneath dumps. Despite Scholl Dump's many documented perils to nearby residents—including dump contaminants leaching through the shattered rock base of the dump into the water table—there is no sunset date yet for this symbol of backward waste policies by Glendale.

There are many reasons to oppose the Gas Plant at Scholl Dump, from pollution to public integrity.

First, opening a gas-powered plant in terrain with known fire risks is a recipe for disaster. Is it really safe to build a Gas Plant in Scholl Canyon, given that wind-driven wildfires, such as in April 2015, regularly plague the area?

Burning the methane produced by the decay of the 56-year-old dump is vastly better for the climate than releasing it. Methane presently captured at the dump is piped off site for power generation. Would the presence of a Gas Plant at Scholl Dump be used to justify prolonging operation of the dump? Local residents are calling for its closure and holding Glendale accountable to its own Zero-Waste Resolution (unanimously passed Dec. 6, 2011: see [http://www.ci.glendale.ca.us/public\\_works/pdf/ZeroWasteResolution.pdf](http://www.ci.glendale.ca.us/public_works/pdf/ZeroWasteResolution.pdf)). The resolution commits the city to 90 percent waste diversion by 2030 and nearly eliminate dumping.

Second, Glendale has failed to operate a transparent and accountable process on the Gas Plant at Scholl Dump that the city is proposing. Before local residents and civic organizations in Eagle Rock or Glendale could ask or get answers for questions about the dump site and its hazards, Glendale closed the comment period to end official public input. That deadline is later this week, on Oct. 20. Glendale has not allowed residents a fair opportunity to review their scheme before this deadline.

Third, this lack of transparency and accountability by Glendale fits a pattern we have seen going back to the effort the city announced in 2014 with a DEIR to prolong and vastly heighten trash dumping. Only determined, outspoken resistance secured extensions in the comment deadlines then and ultimately stopped Glendale from proceeding with its plan.

121-5  
121-6  
121-7  
121-8  
121-9  
121-10  
↓



We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

121-10

Name: John Goldfarb Org. ERNIC Land Use Signature: John Goldfarb

Name: David Smeane Org. ERNIC Signature: David Smeane  
*NOT an official endorsement*

Name: James Panozzo Org. ERNIC Signature: James Panozzo

Name: Julia Eggleston Org. community member Signature: Julia Eggleston

Name: Farah Johansen Org. Community Member Signature: Farah Johansen

Name: Anya Silverman-Stoloff Org. Community member Signature: Anya Silverman-Stoloff

Name: Zoe Alles Org. community member Signature: Zoe Alles

Name: Gabriella Mveller Org. community member Signature: Gabriella Mveller

Name: Alexandra Healey Org. community member Signature: Alexandra Healey

Name: Aidan Holliday Org. Community member Signature: Aidan Holliday

Name: Michael Jimenez Org. community member Signature: Michael Jimenez

Name: Greg Feiner Org. community member Signature: Greg Feiner

Name: Randy Levine Org. community Signature: Randy Levine

We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Margaret Siegel Org. EAPD Signature: Margaret Siegel

Name: Mary Fischer Org. EAPD Signature: Mary Fischer

Name: Helen Mallory Org. GOCHA Signature: Helen Mallory

Name: Owen Lewis Org. CFLA Signature: Owen Lewis

Name: GREG MERIDETH Org. TERA Signature: Greg Merideth

Name: MICHAEL STRICKLAND Org. EAPD Signature: Michael Strickland

Name: Hans Johnson Org. Communities United Signature: Hans Johnson

Name: Audrey Zarkian Org. CFLA Signature: Audrey Zarkian

Name: Mark Fernandes Org. GOCHA Signature: MARK FERNANDES

Name: MiJin Org. CFLA Signature: MiJin Fernandes

Name: Sharon Landin Org. GOCHA Signature: Sharon Landin

Name: Eitan Sadel Org. EOPD Signature: Eitan Sadel

Name: EITAN SADEL Org. EAPD Signature: Eitan Sadel



We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Marla Nelson Org. EAPP GOCHA/CFLA Signature: Marla Nelson

Name: Bob Hutchins Org. GOCHA Signature: Bob Hutchins

Name: Amy G Koss Org. CFLA Signature: Amy G Koss

Name: Mitch H Koss Org. CFLA Signature: Mitch H Koss

Name: Claudia Puig Org. GOCHA/CFLA Signature: Claudia Puig

Name: Luis Lopez Org. TERA Signature: Luis Lopez

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

# Communities United

to



**SCHOLL  
DUMP  
EXPANSION**

**TO:** DENNIS JOE, Planning Division, City of Glendale

**AT:** 818-240-0392

**FROM:** Hans Johnson, for 32 Communities United stakeholders  
hansj@progressivevictory.com and 323-669-9999

**PP:** 4 plus cover

**DATE:** Nov. 9, 2017

**RE:** Proposed placement of gas plant at dump site at Scholl Canyon

**MESSAGE:** Please confirm receiving this collective comment of opposition to the pending proposal now before the Planning Division.

# Communities United



## We Oppose Glendale's Effort to Build a Gas Plant at the Dump in Scholl Canyon

October 17, 2017

Communities United is a multi-jurisdiction nonpartisan coalition formed in 2015, one year after Glendale announced an effort in May 2014 to expand by 17 more stories (180 feet) and extend by at least 20 more years the trash pile at Scholl Canyon. Scholl Dump sits on more than 500 acres at the north end of Figueroa Street, in the southeast corner of Glendale, near the landmark Eagle Rock, just north of the 134 Freeway, not far from the western boundary of Pasadena.

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There are many reasons to oppose the Gas Plant at Scholl Dump, from pollution to public integrity.

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122-1  
122-2  
122-3  
122-4  
122-5  
122-6

We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

122-6

Name: John Goldfarb Org. ERNIC Land Use Signature: [Signature]

Name: DAVID SNEAVE Org. ERNIC Signature: [Signature]  
is NOT an official endorsement

Name: James Panozzo Org. ERNIC Signature: [Signature]  
community member

Name: Julia Eggleston Org. ERNIC Signature: [Signature]  
community member

Name: Farah Johansen Org. Community Member Signature: [Signature]

Name: Anya Silverman-Stoloff Org. Community member Signature: [Signature]

Name: Zoe Alles Org. Community member Signature: [Signature]

Name: Gabriella Myrland Org. Community member Signature: [Signature]

Name: Alexandra Healey Org. community member Signature: [Signature]

Name: Aidan Holliday Org. Community member Signature: Aidan Holliday

Name: Michael J. [unclear] Org. community member Signature: [Signature]

Name: Greg Feiner Org. community member Signature: [Signature]

Name: RANDY LEVINE Org. Community Signature: [Signature]

We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Margaret Siegel Org. EAPD Signature: Margaret Siegel

Name: Mary Fischer Org. EAPD Signature: Mary Fischer

Name: Helen Mallory Org. GOCHA Signature: Helen Mallory

Name: Owen Lewis Org. CFLA Signature: Owen Lewis

Name: GREG MERIDETH Org. TERA Signature: Greg Merideth

Name: MICHAEL STRICKLAND Org. EAPD Signature: Michael Strickland

Name: Hans Johnson Org. Communities United Signature: Hans Johnson

Name: Andny Zarkian Org. CFLA Signature: Andny Zarkian

Name: Mark Fernandes Org. GOCHA Signature: MARK FERNANDES

Name: Mi Jin Org. CFLA Signature: Mi Jin Fernandes

Name: Sharon Landin Org. O Signature: Sharon Landin

Name: Eiken Atchick Org. EOPD Signature: Eiken Atchick

Name: Eitan Sadel Org. EAPD Signature: Eitan Sadel



We join in documenting our concern and opposing the current move by Glendale to proceed with a Gas Plant at Scholl Dump, a proposal that fails the crucial tests of transparency and accountability and poses dangers to the communities adjoining Scholl Canyon.

Name: Marla Nelson Org. <sup>EAPP</sup> GOCHA/CFLA Signature: Marla Nelson

Name: Bob Hutchins Org. GOCHA Signature: Bob Hutchins

Name: Amy G Koss Org. CFLA Signature: Amy G Koss

Name: Mitch H Koss Org. CFLA Signature: Mitch H Koss

Name: Claudia Puig Org. GOCHA/CFLA Signature: Claudia Puig

Name: Luis Lopez Org. TERA Signature: Luis Lopez

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Org. \_\_\_\_\_ Signature: \_\_\_\_\_

**From:** [Jane Lawton Moore](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov); [president@tera90041.org](mailto:president@tera90041.org); [EAPD.LA@gmail.com](mailto:EAPD.LA@gmail.com)  
**Subject:** Scholl Dump - stop expansion  
**Date:** Thursday, November 09, 2017 5:10:59 PM

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Dear Dennis Joe,

I'm writing you concerning the Scholl Dump Expansion Plan. I am a Glendale resident and have resided here for over 12 years. I'm greatly concerned about the expansion of the dump which has no liner protecting it from seeping into groundwater and to our local soil. Furthermore I am 100% against the plan to build a plant at the dump where we will suffer increased emissions. I'm also greatly against the Grayson Power Plant Expansion Plan. Our community and environment will suffer the choices city council makes today if both these expansions go forward.

123-1

123-2

123-3

Thank you for receiving my email and I hope you will reconsider these decisions immediately.

Sincerely,

Jane Potelle  
Concerned Resident and Parent in Glendale



**From:** [John Nugent](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** Gas Plant at Scholl Canyon Dump  
**Date:** Thursday, November 09, 2017 2:31:19 PM

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124

Dear Mr. Joe,

As an Eagle Rock resident and business owner of twenty years, I am very concerned that our community has not had ample time and conversation with the other stakeholders regarding this proposed gas plant that abuts our neighborhood. I hope you will listen to groups like TERA and the ERNC and postpone this project until all stakeholders can truly understand the repercussions for our community.

124-1

Thank you.

Best,

John Nugent  
1921 Addison Way  
LA, CA 90041  
323 610 4694

**From:** [Linda Johnstone Allen](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Cc:** [president@tera90041.org](mailto:president@tera90041.org); [hanspj@aol.com](mailto:hanspj@aol.com); Jose Huizar  
**Subject:** Gas Plant @ Scholl Canyon Dump  
**Date:** Thursday, November 09, 2017 4:40:12 PM

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125

Dennis Joe  
City of Glendale/ Community Development Dept.  
Planning Division Dept.

Case Manager- Dennis Joe:

I am sending this email in regard to the expansion & gas plant development at Scholl Canyon Dump, which I am not in favor of at this juncture. I believe we need to have more information on the processes under which the new gas plant will be operating.

I have been involved with the Eagle Rock community a long time, having led many organizations, including the ER Chamber of Commerce, the Eagle Rock Community Preservation & Revitalization Corp, chair of the Center for the Arts, & Twentieth Century Women's Club. In other words I care a great deal about what happens in this town and how it develops. The Scholl Canyon Dump has never been a situation that included this community's welfare to any great degree. The fact that we cannot use the dump, but yet are forced to have access to same, go through our area, directly by our historical rock, has never been fair. It has ruined the area around our landmark.

I appreciate that Glendale is looking to have more types of energy solutions, but not convinced that the new processes are safe and do not infringe on our community. I believe we need to hear more from your city in regard to those particular processes. Also, there needs to be more assessment of better recycling for energy besides the gas element.

Thank you for considering my comments and I hope the dump situation can be resolved in a manner whereby our community feels more secure about the developments. As of now, we do not.

Regards, Linda Johnstone Allen  
Resident/ Eagle Rock

Sent from Linda Johnstone Allen's iPad

125-1

125-2

125-3

125-4

125-5

125-6

**From:** [Meldia Yesayan](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Cc:** [president@tera90041.org](mailto:president@tera90041.org); [EAPD.LA@gmail.com](mailto:EAPD.LA@gmail.com)  
**Subject:** gas plant at Scholl  
**Date:** Thursday, November 09, 2017 3:27:19 PM

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126

To whom it may concern,

I have been a Glendale resident for 40 years and now a newbie Eagle Rock resident.

I have grave concerns about the gas plant idea for Scholl. I will fight against this and will mobilize our entire local and extended community.

This would be a tragic use of the site and a huge environmental and health concern for our neighborhood, and particularly my young children.

Please consider alternative sites.

Thank you,  
Meldia Yesayan

--

Meldia Yesayan  
Managing Director  
Machine Project  
1200 D North Alvarado, LA, CA 90026  
[www.machineproject.com](http://www.machineproject.com) | 213 483 8761

Sign up for the Machine newsletter [here](#).

● 126-1  
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● 126-2  
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● 126-3  
●

**From:** [Seth Cutler](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** Scholl Canyon Gas Plant expansion  
**Date:** Thursday, November 09, 2017 3:56:16 PM

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127

Dear Dennis,

I am writing to oppose the plans for gas plant in Scholl Canyon. This will negatively impact my home and community.

Seth E. Cutler

127-1

**From:** [Teri Stein](#)  
**To:** [djoe@glendaleca.gov](mailto:djoe@glendaleca.gov)  
**Subject:** Scholl Canyon  
**Date:** Thursday, November 09, 2017 3:12:37 PM

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128

Dear Mr. Joe:

I am writing to express my strong opposition to any expansion of the activities at Scholl Canyon. As someone who lives relatively close to the site, and as a parent with two small children, I do not want my neighborhood to experience any more pollution than we are already subject to. The site is not suitable for expansion and LA residents should not be forced to suffer additional pollution created by Glendale.

128-1

128-2

Thank you for considering my comments.

Teri Stein

Sent from my iPhone

Mr. Dennis Joe, Case Planner  
Community Development Department  
Planning Division Office  
Glendale Water and Power  
141 N. Glendale Avenue  
Glendale, CA 91206

129

Re: Submission of Public Comment for Biogas Renewable Generation Project MND

Dear Mr. Joe,

This letter is to comment on the Mitigated Negative Declaration for the Biogas Renewable Generation Project. I am concerned about the following impact (s):

#### Air Quality

1. The power generator will exceed the AQMD thresholds for criteria pollutant emissions (NO<sub>2</sub>, CO, VOC, and PM<sub>2.5</sub>). The City is planning to “offset” these pollutants by using Priority Reserve Credits. They are trading these pollutants with credits so it wipes out the emissions on paper only.
2. The study (MND) does not factor in the emissions from the current landfill and other proposed projects. (Landfill expansion and anaerobic digester)
- 3 The methane transport pipes will be disconnected during construction and methane will be flared which they estimate will be 15-18 months.

#### Hazards

1. Power plants, power lines, and methane flaring bring the risk of fire and explosion. The landfill is surrounded by residential communities and is located in an area that is deemed a fire hazard by the Glendale Fire Department and the State of California. The proposed 60,000 gallon tank of water does not sufficiently reduce the risks of fire which could spread instantaneously given the trees, dry grasses, and brush blanketing the hills.
2. Nearby neighborhoods of Glenoaks Canyon, Chevy Chase Canyon and Linda Vista have very narrow one-way-out roads which could prove fatal to numerous residents if there is a major explosion and following rapid spreading fire.

#### Geology

1. There are several fault lines within close proximity to the proposed generator. There are no proposed mitigations from liquefaction at Lower Scholl Canyon Park where children play, there are several homes within meters, and children’s baseball fields are located.

#### Cumulative Impacts

1. The City has not taken into account the cumulative health and environmental impacts of all three pending projects: the power generators, the anaerobic digester facility, and the landfill expansion.

Best regards,

Bethsaida Emilia Castillo  
2519 Hollister Terrace  
Glendale, CA 91206